

Control Number: 45720



Item Number: 93

Addendum StartPage: 0

SOAH DOCKET NO. 473-16-3831.WS  
PUC DOCKET NO. 45720

RECEIVED

2016 SEP 14 PM 1:09

PUBLIC UTILITY COMMISSION  
FILING CLERK

APPLICATION OF RIO CONCHO  
AVIATION, INC. FOR A  
RATE/TARIFF CHANGE

§  
§  
§  
§

BEFORE THE STATE OFFICE

OF

ADMINISTRATIVE HEARINGS

**RIO CONCHO AVIATION, INC.'S OBJECTIONS TO  
COMMISSION STAFF'S FOURTH REQUEST FOR INFORMATION  
QUESTION NOS. STAFF 4-1 THROUGH 4-18**

COMES NOW, Rio Concho Aviation, Inc. ("Rio Concho") and files its Objections to Commission Staff's Fourth Request for Information – Question Nos. Staff 4-1 through 4-18.

Commission Staff's Fourth Request for Information was filed on August 31, 2016. Commission Staff agreed to extending the objection deadline to September 14, 2016. These objections are timely filed.

Respectfully submitted,

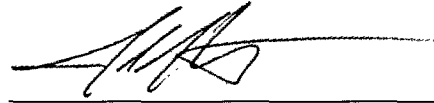
By: 

John J. Carlton  
The Carlton Law Firm P.L.L.C.  
2705 Bee Cave Road, Suite 200  
Austin, Texas 78746  
(512) 614-0901  
Fax (512) 900-2855  
State Bar No. 03817600

ATTORNEY FOR RIO CONCHO AVIATION,  
INC.

## **CERTIFICATE OF SERVICE**

I hereby certify that I have served or will serve a true and correct copy of the foregoing document via hand delivery, facsimile, electronic mail, overnight mail, U.S. mail and/or Certified Mail Return Receipt Requested to all parties on this the 14th day of September, 2016.

A handwritten signature in black ink, appearing to read 'J. Carlton', is written over a horizontal line.

John Carlton

**REQUEST FOR INFORMATION  
QUESTION NOS. STAFF 4-1 THROUGH 4-18**

**STAFF RFI 4-1.** Please provide all detailed invoices for rate case expenses for which Rio Concho intends to request recovery. Please include hours spent, hourly rate, description of work performed, and the name of the person providing the services. Please also include invoices and descriptive backup documentation for any expenses charged on the invoices.

**OBJECTION:** Rio Concho objects to this request to the extent it seeks information protected by the Attorney Client privilege.

**STAFF RFI 4-7.** Please provide a complete listing (names and locations) of all businesses not already included in Ms. Brunson's direct testimony that employ Ms. Brunson or are operated by Ms. Brunson, and the amount of time spent weekly by Ms. Brunson on each business.

**OBJECTION:** Rio Concho objects to this request as irrelevant to this proceeding. Whether Ms. Brunson spend time working for other businesses when she is not working on Rio Concho matters is irrelevant to the reasonableness of the revenue requirement in this proceeding.

**STAFF RFI 4-9.** Please provide totals for contract labor expense, salaries expense, and employee benefits for the years ending 12/31/2014, 12/31/2013, and 12/31/2012.

**OBJECTION:** Rio Concho objects to this request as irrelevant to this proceeding. The revenue requirement for this proceeding is based upon the 2015 test year as adjusted for known and measureable changes. The expenses that Rio Concho incurred in prior years is irrelevant to the determination of reasonableness of the requested revenue requirement based upon the 2015 test year.

**STAFF RFI 4-10.** Please explain in detail the reason for all changes in contract labor expense, salary expense, and employee benefit expense for Rio Concho for the years ending 12/31/2014, 12/31/2013, and 12/31/2012.

**OBJECTION:** Rio Concho objects to this request as irrelevant to this proceeding. The revenue requirement for this proceeding is based upon the 2015 test year as adjusted for known and measureable changes. The expenses that Rio Concho incurred in prior years is irrelevant to the determination of reasonableness of the requested revenue requirement based upon the 2015 test year.