



Control Number: 45720



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

RECEIVED

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

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BEFORE THE STATE OFFICE

2016 SEP 16 PM 2:31  
PUBLIC UTILITY COMMISSION  
FILING CLERK

ADMINISTRATIVE HEARINGS

COMMISSION STAFF'S SUPPLEMENTAL RESPONSE TO RIO CONCHO  
AVIATION, INC.

FIRST REQUEST FOR DISCLOSURE

QUESTION NOS. RCA 194.2(A), (C), (F)(I)-(III) & (IV)(A) AND (I)

The Staff of the Public Utility Commission of Texas (Staff) stipulates that the following response(s) to request(s) for information/request(s) for admission/request(s) for disclosure/request(s) and production may be treated by all parties as if the answers were filed under oath.

Dated: September 16, 2016

Respectfully Submitted,

**PUBLIC UTILITY COMMISSION OF TEXAS  
LEGAL DIVISION**

Margaret Uhlig Pemberton  
Division Director

Katherine Lengieza Gross  
Managing Attorney



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Kennedy R. Meier  
State Bar No. 24092819  
Vera Dygert  
State Bar No. 24094634  
1701 N. Congress Avenue  
P.O. Box 13326  
Austin, Texas 78711-3326  
(512) 936-7265  
(512) 936-7268 (facsimile)

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**CERTIFICATE OF SERVICE**

I certify that a copy of this document will be served on all parties of record on September 16, 2016, in accordance with 16 TAC § 22.74.



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Vera Dygert

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**COMMISSION STAFF'S SUPPLEMENTAL RESPONSE TO RIO CONCHO  
AVIATION, INC.**

**FIRST REQUEST FOR DISCLOSURE  
QUESTION NOS. RCA 194.2(A), (C), (F)(I)-(III) & (IV)(A) AND (I)**

**RCA 194.2(a):** The correct names of the parties to this action.

**RESPONSE:** The correct name of the Public Utility Commission of Texas is the Public Utility Commission of Texas. Staff is not authorized to represent the correct name of any other party in the proceeding.

Prepared by: Vera Dygert  
Sponsor: Vera Dygert

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FIRST REQUEST FOR DISCLOSURE  
QUESTION NOS. RCA 194.2(A), (C), (F)(I)-(III) & (IV)(A) AND (I)**

**RCA 194.2(c):** The legal theories and, in general, the factual bases of the responding party's claims or defenses (the responding party need not marshal all evidence that may be offered at trial).

**RESPONSE:** To the extent that Rio Concho is asking for Staff's legal theories in Docket No. 45720 and the factual bases of Staff's claims or defenses in Docket No. 45720, Staff refers Rio Concho to the direct testimony submitted by Staff on September 9, 2016.

Prepared by: Vera Dygert

Sponsor: Debi Loockerman, Elisabeth English, Andrew Novak

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FIRST REQUEST FOR DISCLOSURE  
QUESTION NOS. RCA 194.2(A), (C), (F)(I)-(III) & (IV)(A) AND (I)**

**RCA 194.2(f):** For any testifying expert:

- (i) the expert's name, address and telephone number;
- (ii) the subject matter on which the expert will testify;
- (iii) the general substance of the expert's mental impressions and opinions and a brief summary of the basis for them, or if the expert is not retained by, employed by, or otherwise subject to the control of the responding party, documents reflecting such information;
- (iv) if the expert is retained by, employed by, or otherwise subject to the control of the responding party:
  - (a) all documents, tangible things, reports, models, or data compilations that have been provided to, reviewed by, or prepared by or for the expert in anticipation of the expert's testimony; and

**RESPONSE:** Elisabeth English

- (i) Elisabeth English  
1701 N. Congress Ave.  
Austin, TX 78711  
(512) 936-7217
- (ii) To the extent that Rio Concho is asking about the subject matter of experts' testimony in Docket No. 45720, Elisabeth English will testify about depreciation and rate design.
- (iii) To the extent that Rio Concho is asking about the general substance of the expert's mental impressions and opinions in Docket No. 45720, please refer to the direct testimony of Elisabeth English filed on September 9, 2016.
- (iv) To the extent that Rio Concho is asking about documents, tangible things, reports, models, or data compilations that have been provided to, reviewed by, or prepared by or for the expert in Docket No. 45720, documents relied upon, reviewed, or prepared

by Elisabeth English include all documents filed in Docket No. 45720 and all documents referenced in the prefiled testimony of Elisabeth English.

Debi Ruth Loockerman

- (i) Debi Ruth Loockerman  
1701 N. Congress Ave.  
Austin, TX 78711  
(512) 936-7384
- (ii) To the extent that Rio Concho is asking about the subject matter of experts' testimony in Docket No. 45720, Debi Loockerman will testify about cost of service, operations and maintenance expenses, and invested capital.
- (iii) Please refer to the direct testimony of Debi Loockerman filed on September 9, 2016.
- (iv) To the extent that Rio Concho is asking about documents, tangible things, reports, models, or data compilations that have been provided to, reviewed by, or prepared by or for the expert in Docket No. 45720, documents relied upon, reviewed, or prepared by Debi Loockerman include all documents filed in Docket No. 45720, all documents cited in the prefiled testimony of Debi Loockerman, and previously filed applications in docket numbers 45418, 45491, 45660, 46069, 45123, 46144, 46104, 46245, and 46247.

Andrew Connor Novak

- (i) Andrew Connor Novak  
1701 N. Congress Ave.  
Austin, TX 78711  
(512) 936-7016
- (ii) To the extent that Rio Concho is asking about the subject matter of experts' testimony in Docket No. 45720, Andrew Novak will testify about the overall rate of return and return on equity.
- (iii) Please refer to the direct testimony of Andrew Novak filed on September 9, 2016.
- (iv) To the extent that Rio Concho is asking about documents, tangible things, reports, models, or data compilations that have been provided to, reviewed by, or prepared by or for the expert in Docket No. 45720, documents relied upon, reviewed, or prepared by Andrew Novak include all documents filed in Docket No.

45720 and all documents cited in the prefiled testimony of Andrew Novak.

Prepared by: Vera Dygert, Debi Loockerman, Elisabeth English, Andrew Novak  
Sponsor: Debi Loockerman, Elisabeth English, Andrew Novak



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**RCA 194.2(i):** Any witness statements described in Rule 192.3(h).

**RESPONSE:** To the extent that Rio Concho is asking Staff to produce witness statements related to Docket No. 45720 that are in Staff's possession, custody, or control, Staff does not have such witness statements.

Prepared by: Vera Dygert

Sponsor: Vera Dygert