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Addendum StartPage: 0

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PUBLIC UTILITY COMMISSION
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APPLICATION OF DOUBLE
DIAMOND UTILITY COMPANY, INC. §
FOR WATER AND SEWER §
RATE/TARIFF CHANGE §

BEFORE THE STATE OFFICE
OF
ADMINISTRATIVE HEARINGS

DOUBLE DIAMOND UTILITY COMPANY, INC.'S
RESPONSE TO THE CLIFFS UTILITY COMMITTEE'S
FIRST REQUEST FOR INFORMATION
TCUC NO. 1-1 THROUGH 1-31

COMES NOW, Double Diamond Utility Company, Inc. ("DDU") and files its Response to The Cliffs Utility Committee's First-Request for Information – TCUC No. 1-1 through 1-31.

Respectfully submitted,

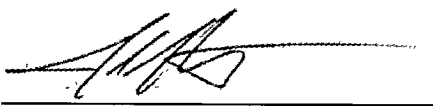
By: 

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ATTORNEY FOR DOUBLE DIAMOND
UTILITY COMPANY, 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 November, 2016



John Carlton

**TCUC'S FIRST REQUEST FOR INFORMATION TO
DOUBLE DIAMOND UTILITY COMPANY, INC.
TCUC NO. 1-1 THROUGH 1-31**

TCUC NO. 1-1 Please provide all "confidential" documents filed with the Commission in this matter.

RESPONSE: Responsive documents were previously produced as Confidential Documents pursuant to the terms of the Protect Order in response to White Bluff Ratepayers Group RFI WBRG NO. 1-1.

TCUC NO. 1-2 Please provide basis for known and measurable changes to "Employee Labor" as listed on line 5, Schedule I-1 (THE CLIFFS (Total)) in the amount of \$ 61,871.00.

RESPONSE: The \$61,871 is the sum of \$25,824 on line 5 column e of Schedule I-1 THE CLIFFS (Water) and \$36,047 on line 5 column e of Schedule I-1 THE CLIFFS (Sewer).

Prepared and sponsored by Jay Joyce.

TCUC NO. 1-3 Please provide receipts, invoices, and general ledger for all expenses included in "Other Plant Maintenance" as listed on line 9, Schedule I-1 (THE CLIFFS (Total)) in the amount of \$123,059.00.

RESPONSE: See Response to WBRG NO. 1-1 at pages DDU001166-DDU1185, DDU001240-DDU001357, and DDU001397-DDU001597 for the requested receipts and invoices. See Response to TCUC NO. 1-29 for the requested general ledger.

Prepared and sponsored by Jay Joyce.

TCUC NO. 1-4 Please provide receipts, invoices, and general ledger for all expenses included in "Other Plant Maintenance" as listed in Schedule II-10(a) (THE CLIFFS (Total)) for the years ending 12/31/13 (\$61,358) and 12/31/14 (\$109,897).

REPOSE: Responsive documents will be produced as Confidential Documents pursuant to the terms of the Protective Order.

Prepared by Christie Rotramel.

Sponsored by Kevin Shea.

TCUC NO. 1-5 Please provide receipts, invoices, and general ledger for all expenses included in “Miscellaneous Expenses” as listed on line 22, Schedule I-1 (THE CLIFFS (Total)) in the amount of \$41,113.

RESPONSE: See Response to TCUC NO. 1-29 for the requested general ledger.

Prepared and sponsored by Jay Joyce.

TCUC NO. 1-6 Please provide receipts, invoices, and general ledger for all expenses included in “Miscellaneous Expenses” as listed on Schedule II-19 (THE CLIFFS (Total)) for the years ending 12/31/13 (\$1,256) and 12/31/14 (\$42,497).

RESPONSE: See documents produced in response to TCUC 1-4.

Prepared by Christie Rotramel.

Sponsored by Kevin Shea.

TCUC NO. 1-7 For all employees listed on Schedule II-6 (THE CLIFFS (Total)): Please indicate whether the employee is working solely at the The Cliffs subdivision or if the employee works at other systems owned by Double Diamond.

RESPONSE: All of the employees listed on Schedule II-6 (THE CLIFFS (Total)) work solely at The Cliffs except Buck Nunley who works at other systems related to DDU.

Prepared and sponsored by Jay Joyce.

TCUC NO. 1-8 For any employee whose time is split between The Cliffs and another system owned by Double Diamond, please provide the basis for allocation of the expenses for that employee between the systems.

RESPONSE: The payroll and payroll-related expenses for the employee who works for multiple systems are allocated among the systems based on his estimated time spent on the systems.

Prepared and sponsored by Jay Joyce.

TCUC NO. 1-9 Please provide receipts, invoices, and general ledger for all expenses listed in “Professional Services” as listed on line 18 of Schedule I-1 (THE CLIFFS (Total)) in the amount of \$24,259.

RESPONSE: See Response to WBRG NO. 1-1 at pages DDU001055-DDU1159 for the requested receipts and invoices. See Response to TCUC NO. 1-29 for the requested general ledger.

Prepared and sponsored by Jay Joyce.

TCUC NO. 1-10 Please provide receipts, invoices and general ledger for all expenses listed in “Regulatory Expense” as listed on line 21 of Schedule I-1 (THE CLIFFS (Total)) in the amount of \$25,212. Please also provide the basis for the increase in this expense from the previous year

RESPONSE: See Response to WBRG NO. 1-1 at pages DDU001605-DDU001729 for the requested receipts and invoices. See Response to TCUC NO. 1-29 for the requested general ledger.

The bases for the increase may be located in the Application (non-confidential) at Schedule II-18 for THE CLIFFS (Total) in response to the following question on that page: “If the actual for the Test Year is higher the previous years, indicate the reasons for the increase.”

Prepared and sponsored by Jay Joyce.

TCUC NO. 1-11 Please provide the basis of allocation of all expenses listed on Schedule I-1 (THE CLIFFS (Total)) between the water and the wastewater utility and allocation of expenses between systems (White Bluffs, Retreat, and the Cliffs)

REPOSE: This response assumes that the question refers to Column D on the referenced schedule. The expenses listed in Column D on Schedule I-1 for THE CLIFFS (Total) are not the result of an allocation or allocations; rather, the expenses listed in Column D on Schedule I-1 for THE CLIFFS (Total) are the result of the sum of the categories of expenses in Column D on Schedule I-1 for THE CLIFFS (Water) and the corresponding categories of expenses in Column D on Schedule I-1 for THE CLIFFS (Sewer).

For preparation of the application, the expenses for each water expense category and the corresponding expenses for each sewer category were summed and allocated between the water and sewer applications by applying to each summation the ratio of the number of water or sewer customers to the total number of customers, except that the expenses in the following categories were directly assigned to either water or sewer:

- Electricity
- Professional Fees
- R&M Equipment
- R&M Chemicals
- R&M Water Plant
- R&M Sewer Plant
- R&M Distribution Lines
- R&M Collection Lines
- Water Tests
- Regulatory Water Fees
- Sewer Tests
- Sewer Tap Expense

The expenses are not allocated among different systems in Column D on Schedule I-1 for THE CLIFFS (Total).

Prepared and sponsored by Jay Joyce.

TCUC NO. 1-12 Please provide a full listing of all assets claimed by Double Diamond on line 2 of Schedule III-2 (THE CLIFFS (Total)) in the amount of \$5,834,728.

RESPONSE: The \$5,834,728 in total assets referenced in the question is the sum of the water assets of \$2,724,112 shown on line 2 of Schedule III-2 of THE CLIFFS (Water) and the sewer assets of \$3,110,615 on line 2 of Schedule III-2 of THE CLIFFS (Sewer). The listing of assets may be found in the Response to WBRG NO. 1-1 at pages DDU000152-DDU000168.

Prepared and sponsored by Jay Joyce.

TCUC NO. 1-13 Please provide invoices for all assets identified in response to TCUC NO. 1-12.

RESPONSE: See Response to WBRG NO. 1-1 at pages DDU000227-DDU000659 for the requested information.

Prepared and sponsored by Jay Joyce.

TCUC NO. 1-14 Please provide proof of payment (e.g Cancelled checks) relating to the assets identified in response to TCUC NO. 1-12.

RESPONSE: Cancelled checks are not available.

Prepared by Christie Rotramel.

Sponsored by Kevin Shea.

TCUC NO. 1-15 For each assets identified in response to TCUC NO. 1-12, please detail whether the asset was purchased, or constructed by Double Diamond or by the developer of the subdivision.

RESPONSE: Responsive documents will be produced as Confidential Documents pursuant to the terms of the Protective Order. However; Double Diamond has not completed its work to compile the response requested by TCUC. Upon completion of the detail requested, Double Diamond will produce the documents.

Prepared and sponsored by Jay Joyce.

TCUC NO. 1-16 Please provide annual income statements for Double Diamond for 2013, 2014, and 2015.

RESPONSE: Responsive documents will be produced as Confidential Documents pursuant to the terms of the Protective Order.

Prepared by Christie Rotramel.

Sponsored by Kevin Shea.

TCUC NO. 1-17 Please provide annual income statements for Double Diamond, Inc., for 2013, 2014, and 2015.

RESPONSE: Responsive documents will be produced as Confidential Documents pursuant to the terms of the Protective Order.

Prepared by Christie Rotramel.

Sponsored by Kevin Shea.

TCUC NO. 1-18 Please provide end of year balance sheets for Double Diamond, Inc., for 2013, 2014, and 2015.

RESPONSE: No responsive documents exist.

Prepared by Christie Rotramel.

Sponsored by Kevin Shea.

TCUC NO. 1-19 Please provide end of year balance sheets for Double Diamond, Inc. for 2013, 2014, and 2015.

RESPONSE: No responsive documents exist.

Prepared by Christie Rotramel.

Sponsored by Kevin Shea.

TCUC NO. 1-20 Please provide an organizational chart for Double Diamond indicating Double Diamond employees and management.

RESPONSE: No responsive documents exist.

Prepared by Christie Rotramel.

Sponsored by Randy Gracy.

TCUC NO. 1-21 Please provide a listing of all Affiliates of Double Diamond.

RESPONSE: Double Diamond Delaware, Inc is the only affiliate of Double Diamond.

Prepared by Christie Rotramel.

Sponsored by Randy Gracy.

TCUC NO. 1-22 Please provide a corporate organizational chart for Double Diamond, Inc., showing all corporations owned in whole or in part by Double Diamond, Inc.

RESPONSE: No responsive documents exist.

Prepared by Christie Rotramel.

Sponsored by Randy Gracy.

TCUC NO. 1-23 Please provide operating reports and ground water pumpage reports indicating the amount of water pumped monthly for 2013, 2014, and 2015 from Possum Kingdom Lake servicing the The Cliffs system.

RESPONSE: See Response to WBRG NO. 1-1 at pages DDU000183 for the requested information for 2015. Responsive documents for 2013 and 2014 will be produced as Confidential Documents pursuant to the terms of the Protective Order.

Prepared by Jay Joyce and Christie Rotramel.

Sponsored by Randy Gracy and Jay Joyce.

TCUC NO. 1-24 Please provide all reports, or studies relating to measures taken or to be taken by Double Diamond to reduce the amount of "Total unaccounted for water" shown on Schedule II-1(a) (THE CLIFFS (Total)).

RESPONSE: No responsive documents exist.

Prepared by Christie Rotramel.

Sponsored by Randy Gracy.

TCUC NO. 1-25 Please identify all customer accounts on the The Cliffs system where the customer is Double Diamond or an affiliate of Double Diamond.

RESPONSE: No such customer accounts exist.

Prepared by Christie Rotramel.

Sponsored by Randy Gracy.

TCUC NO. 1-26 For all customer accounts identified in response to TCUC NO. 1-25, please provide all bills sent to and all payments made by the customers during calendar years 2013, 2014, and 2015.

RESPONSE: No such customer accounts exist.

Prepared by Christie Rotramel.

Sponsored by Randy Gracy.

TCUC NO. 1-27 Please provide a listing of all customer complaints pertaining to service, leaks, water quality, and maintenance requests received from Double Diamond for 2013, 2014, and 2015 relating to the The Cliffs system.

RESPONSE: No responsive documents exist. See response to TCUC NO 1-28.

Prepared by Christie Rotramel.

Sponsored by Randy Gracy.

TCUC NO. 1-28 Please provide work orders and/or other forms of documentation showing the date and manner in which the complaints listed in response to TCUC NO. 1-27 were responded to.

RESPONSE: Responsive documents will be produced as Confidential Documents pursuant to the terms of the Protective Order.

Prepared by Christie Rotramel.

Sponsored by Kevin Shea and Randy Gracy.

TCUC NO. 1-29 Please provide General Ledgers for Double Diamond for 2013, 2014, and 2015.

RESPONSE: Responsive documents will be produced as Confidential Documents pursuant to the terms of the Protective Order.

Prepared by Christie Rotramel.

Sponsored by Kevin Shea.

TCUC NO. 1-30 Please provide future capital improvement plans, master plans and financial plans developed by Double Diamond as it identifies future infrastructure and planning needs for the utility.

RESPONSE: No responsive documents exist.

Prepared by Christie Rotramel.

Sponsored by Kevin Shea and Randy Gracy.

TCUC NO. 1-31 Please provide a listing of all accounts served by DDU on the The Cliffs System, please include the property address and meter size for each account.

REPONSE: No responsive documents exist.

Prepared by Christie Rotramel.

Sponsored by Kevin Shea and Randy Gracy.