

Control Number: 46245



Item Number: 551

Addendum StartPage: 0

SOAH DOCKET NO. 473-17-0119.WS  
PUC DOCKET NO. 46245

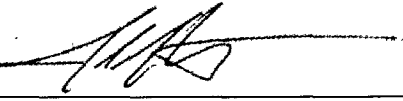
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2017 MAY 11 PM 2:24

APPLICATION OF DOUBLE § BEFORE THE STATE OFFICE OF PUBLIC UTILITY COMMISSION  
DIAMOND UTILITY COMPANY, INC. § OF FILING CLERK  
FOR WATER AND SEWER § ADMINISTRATIVE HEARINGS  
RATE/TARIFF CHANGE §

**DOUBLE DIAMOND UTILITY COMPANY, INC.'S AMENDED  
AND FIRST SUPPLEMENTAL RESPONSE TO THE CLIFFS UTILITY  
COMMITTEE'S FIRST REQUEST FOR INFORMATION**

COMES NOW, Double Diamond Utility Company, Inc. ("DDU") and files its Amended Response to The Cliffs Utility Committee's First Request for Information – TCUC No. 1-1, 1-4, 1-12 through 1-17, 1-21, 1-23, 1-25, 1-26, 1-28, 1-29, 1-31.

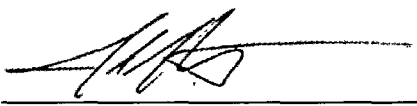
Respectfully submitted,

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 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 11<sup>th</sup> day of May, 2017.

  
John Carlton

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**DOUBLE DIAMOND UTILITY COMPANY, INC.'S AMENDED AND FIRST  
SUPPLEMENTAL RESPONSE TO THE CLIFFS UTILITY COMMITTEE'S  
FIRST REQUEST FOR INFORMATION**

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

**RESPONSE:** Responsive documents were previously produced in response to White Bluff Ratepayers Group RFI WBRG NO. 1-1. See bates DDU000179, DDU001956, DU003571 – DDU003592.

**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).

**REPONSE:** Responsive documents will be produced. See bates DDU006510-DDU007256.

Prepared by Christie Rotramel.

Sponsored by Tim Grout.

**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 corrected amount is \$2,630,181 in total original cost assets which is the sum of the corrected water assets of \$1,612,546 shown on line 2 of Corrected Schedule III-2 of THE CLIFFS (Water) and the sewer assets of \$1,017,635 on line 2 of Corrected Schedule III-2 of THE CLIFFS (Sewer). The corrected listings of the water and sewer assets may be found in the Errata Work Papers. See bates DDU16-011244, DDU16-011255, and DDU16-011340-DDU16-011347 filed in support of the application.

Prepared and sponsored by Jay Joyce.

*J*

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

**RESPONSE:** Responsive documents have been produced. See bates DDU008562 – 008998, DDU16-009124 – DDU16-009263, DDU16-014054 – DDU16-010993 filed in support of the application.

**Prepared and sponsored by Victoria Harkins.**

**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. See documents produced in response to TCUC No. 1-13.

**Prepared by Christie Rotramel and Victoria Harkins.**

**Sponsored by Tim Grout.**

**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:** See Errata Work Papers, bates DDU16-011340 – DDU16-011347, and bates DDU16-011359 - DDU16-011368 filed in support of the application.

**Prepared and sponsored by Jay Joyce.**

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

**RESPONSE:** Responsive documents will be produced. See bates DDU007257 – DDU007272.

**Prepared by Christie Rotramel.**

**Sponsored by Tim Grout.**

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

**RESPONSE:** Responsive documents were previously produced as Confidential Documents pursuant to the terms of the Protective Order. See bates DDU007273 – DDU007288.

**Prepared by Christie Rotramel.**

**Sponsored by Tim Grout.**

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

**RESPONSE:** Responsive documents will be produced for affiliates of Double Diamond within The Cliffs development. See bates DDU16-015226 – DDU16-015227.

**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. See bates DDU007289 – DDU007373.

**Prepared by Jay Joyce and Christie Rotramel.**

**Sponsored by Randy Gracy and Jay Joyce.**

**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:** Responsive documents will be produced. See bates DDU16-013194.

**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:** Responsive documents will be produced. See bates DDU16-013195 – DDU16-015225.

**Prepared by Christie Rotramel.**

**Sponsored by Randy Gracy.**

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**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. See bates DDU007374-DDU007690.

Prepared by Christie Rotramel.

Sponsored by Tim Grout 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. See bates DDU007691 – DDU008561.

Prepared by Christie Rotramel.

Sponsored by Tim Grout.

**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:** Responsive documents will be produced. See bates DDU16-011376 – DDU16-011621.

Prepared by Christie Rotramel.

Sponsored by Tim Grout and Randy Gracy.

SOAH NO: 473-17-0119.WS  
PUC NO: 46245  
Application of Double Diamond  
Utility Company, Inc. for Water  
and Sewer Tariff/Rate Change

Bates DDU006510 - DDU007272  
DDU007289 - DDU008361  
DDU16-011376 - DDU16-011621  
DDU16-013194 - DDU16-015227  
Amended & 1<sup>st</sup> Supp Response to  
TCUC's 1<sup>st</sup> RFI