

Control Number: 46245



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

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

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§  
§  
§

BEFORE THE STATE OFFICE  
OF PUBLIC UTILITY COMMISSION  
FILING CLERK  
ADMINISTRATIVE HEARINGS

COMMISSION STAFF'S SECOND REQUEST FOR INFORMATION  
TO DOUBLE DIAMOND UTILITY COMPANY, INC.  
QUESTION NOS. STAFF 2-1 THROUGH STAFF 2-13

Pursuant to 16 Tex. Admin. Code Ann. § 22.144 (TAC), the Staff of the Public Utility Commission of Texas (Staff) requests that the Double Diamond Utility Company, Inc. by and through its attorneys of record, provide the following information and answer the following question(s) under oath. The question(s) shall be answered in sufficient detail to fully present all of the relevant facts, within the time limit provided by the Presiding Officer or within 20 days, if the Presiding Officer has not provided a time limit. Please copy the question immediately above the answer to each question. These question(s) are continuing in nature, and if there is a relevant change in circumstances, submit an amended answer, under oath, as a supplement to your original answer. State the name of the witness in this cause who will sponsor the answer to the question and can vouch for the truth of the answer.

Provide an original and three copies of your answers to the questions to the Filing Clerk, Public Utility Commission of Texas, 1701 N. Congress Avenue, P.O. Box 13326, Austin, Texas 78712-3326.

570

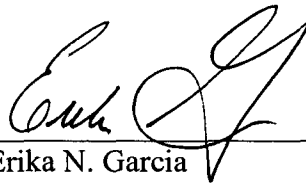
Dated: July 26, 2017

Respectfully Submitted,

**PUBLIC UTILITY COMMISSION OF TEXAS  
LEGAL DIVISION**

Margaret Uhlig Pemberton  
Division Director

Stephen Mack  
Managing Attorney



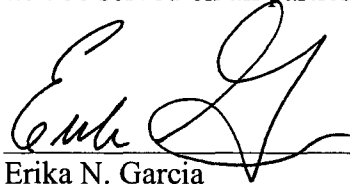
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Austin, Texas 78711-3326  
(512) 936-7290  
(512) 936-7268 (facsimile)  
erika.garcia@puc.texas.gov

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**CERTIFICATE OF SERVICE**

I certify that a copy of this document will be served on all parties of record on July 26, 2017 in accordance with 16 TAC § 22.74.



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Erika N. Garcia

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**COMMISSION STAFF'S SECOND REQUEST FOR INFORMATION  
TO DOUBLE DIAMOND UTILITY COMPANY, INC.  
QUESTION NOS. STAFF 2-1 THROUGH STAFF 2-13**

**DEFINITIONS**

- A. "Double Diamond," "the Company" or "you" refers to Double Diamond Utility Company, Inc. and any person acting or purporting to act on their behalf, including without limitation, attorneys, agents, advisors, investigators, representatives, employees or other persons.
- B. "Document" includes any written, recorded, or graphic matter, however produced or reproduced, including but not limited to correspondence, telegrams, contracts, agreements, notes in any form, memoranda, diaries, voice recording tapes, microfilms, pictures, computer media, work papers, calendars, minutes of meetings or other writings or graphic matter, including copies containing marginal notes or variations of any of the foregoing, now or previously in your possession. In the event any documents requested by this Request for Information have been transferred beyond the Company's control, describe the circumstances under which the document was destroyed or transferred and provide an exact citation to the subject document. In the event that documents containing the exact information do not exist, but documents do exist which contain portions of the required information or which contain substantially similar information, then the definition of "documents" shall include the documents which do not exist and these documents will be provided.

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**COMMISSION STAFF'S SECOND REQUEST FOR INFORMATION  
TO DOUBLE DIAMOND UTILITY COMPANY, INC.  
QUESTION NOS. STAFF 2-1 THROUGH STAFF 2-13**

**INSTRUCTIONS**

- 1) Pursuant to 16 TAC § 22.144(c)(2), Staff requests that answers to the requests for information be made under oath.
- 2) Please copy the question immediately above the answer to each question. State the name of the witness in this cause who will sponsor the answer to the question and can vouch for the truth of the answer.
- 3) These questions are continuing in nature, and if there is a relevant change in circumstances, submit an amended answer, under oath, as a supplement to your original answer.
- 4) Words used in the plural shall also be taken to mean and include the singular. Words used in the singular shall also be taken to mean and include the plural.
- 5) The present tense shall be construed to include the past tense, and the past tense shall be construed to include the present tense.
- 6) If any document is withheld under any claim of privilege, please furnish a list identifying each document for which a privilege is claimed, together with the following information: date, sender, recipients or copies, subject matter of the document, and the basis upon which such privilege is claimed.
- 7) Pursuant to 16 TAC § 22.144(g)(4), if the response to any request is voluminous, please provide a detailed index of the voluminous material.
- 8) Staff requests that each item of information be made available as it is completed, rather than upon completion of all information requested.

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QUESTION NOS. STAFF 2-1 THROUGH STAFF 2-13**

**The Cliffs**

- Staff 2-1 Please provide a copy of the job descriptions for the following employees:  
a) Christopher C. Fields  
b) Cameron Brett Kirby
- Staff 2-2 Please explain if Christopher Fields and Cameron Brett Kirby were terminated during the test year. If so, please provide the dates of termination.
- Staff 2-3 Please explain why Condos #1-10 are in the Power Expense (Line 2) of the Revenue Requirement Summary? How does this relate to the water utility?
- Staff 2-4 Please provide the invoice for Buchanan Building Supply for the amount of \$106.20 on 05/06/2015.
- Staff 2-5 Please provide all invoices for all uniforms for the utility.
- Staff 2-6 Please provide the invoice for O'Reilly Auto Parts for the amount of \$104.19 on 06/08/2015.
- Staff 2-7 Please provide the invoice from Ford for Acct# 50062469 in the amount of \$730.11 on 01/15/2015.
- Staff 2-8 Please provide the invoice for NewGen Solutions & Strategies, LLC. in the amount of \$1,575 on 02/16/2015, reference number 3170.
- Staff 2-9 Please provide the invoice for USA Blue Book for the amount \$419.51 on 02/25/2015, reference number 576150.
- Staff 2-10 Please provide the invoice for Progressive Water Treatment for the amount of \$4,871.25 on 12/01/2015, reference number 5155.
- Staff 2-11 Please provide the invoices for customer #385531 for the amount of \$1,659.34 on 09/24/2015, reference number 760045.
- Staff 2-12 Please provide invoice #421 for the amount of \$2,500 on 03/19/2015, reference number 24219.

Staff 2-13 Please provide invoice #416 for the amount \$9,087.19 on 04/14/2015, reference number 0024441.