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

BEFORE THE STATE OFFICE
OF PUBLIC UTILITY COMMISSION
ADMINISTRATIVE HEARINGS

**DOUBLE DIAMOND UTILITY COMPANY, INC.'S RESPONSE TO
WHITE BLUFF RATEPAYERS GROUP'S MOTION TO COMPEL
DDU TO RESPOND TO WBRG'S FOURTH REQUESTS FOR INFORMATION**

COMES NOW, Double Diamond Utility Company, Inc. ("DDU") and files its Response to White Bluff Ratepayers Group's ("WBRG") Motion to Compel DDU to Respond to WBRG's Fourth Requests for Information ("Motion"). In support thereof, DDU would respectfully show as follows:

I. Introduction

WBRG filed the Motion on Tuesday, October 10, 2017. This response is timely filed.

II. Response to WBRG Request 4-3

WBRG's Request 4-3 stated:

Double Diamond's Consolidated Financial Statements on page DDU003577 states that "Costs that are directly identifiable with land development projects are capitalized." Please describe the costs relating to the White Bluff development that have been capitalized for purposes of determining the cost of lots sold at White Bluff.

DDU has responded to WBRG's Request 4-3 by stating:

Responsive documents will be produced as Confidential Documents pursuant to the terms of the Protective Order. The spreadsheets produced are trade secret business records that would give competitors an unfair advantage in the marketplace if they became public records.

DDU's answer and the documents produced are response to WBRG's request.

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III. Response to WBRG Request 4-4

WBRG's Request 4-4 stated "Please provide all ledger entries for the Balance Sheet Asset Account "Inventory" made during 1996." DDU objected to this request by stating:

OBJECTION: DDU objects to this request as irrelevant and overbroad. The requested information is not relevant to the establishment of rates for the White Bluff utility systems.

RESPONSE: The ledger entries for the Balance Sheet Asset Account "Inventory" relate to lot inventory within the development and are not relevant to this proceeding.

As explained by DDU, the Inventory does not relate to costs of constructing or operating the utility systems which are the subject of this proceeding.

IV. Response to WBRG Request 4-8

WBRG's Request 4-8 stated:

Admit or deny. The value of the assets listed in the 2015 Depreciation and Amortization Report (DDU16-015470 – DDU16-015475) cannot be reconciled to the values of the assets listed in Exhibit DDU-6C. If your answer is anything other than an unqualified admit, please provide a reconciliation between the 2015 Depreciation and Amortization Report and Exhibit DDU-6C.

DDU has responded to WBRG's Request 4-3 by stating: "Deny. DDU will provide a reconciliation upon completion." To date, no reconciliation has been completed. DDU will amend its response.

V. Response to WBRG Request 4-13

WBRG's request 4-13 stated:

Please provide copies of the current effective water and sewer tariff for Double Diamond that is applicable within the White Bluff Subdivision, and

provide copies of all previous tariffs applicable within the White Bluff Subdivision.

DDU has responded to WBRG's Request 4-13 by stating:

OBJECTION: DDU objects to this request as irrelevant and overbroad. The requested information is not relevant to the establishment of rates for the White Bluff utility systems based upon the current test year.

RESPONSE: Responsive documents will be produced for the most recent tariffs.

DDU is conducting a diligent search of its records to locate the full tariff but the only documents located to date for the current tariff are the ones that have been produced.

III.

DDU prays that WBRG's Motion to Compel be denied.

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 17th day of October, 2017.

A handwritten signature in black ink, appearing to read 'John Carlton', with a long horizontal line extending to the right.

John Carlton