



Control Number: 46256



Item Number: 1443

Addendum StartPage: 0

SOAH DOCKET NO. 473-17-1641.WS
PUC DOCKET NO. 46256

RECEIVED

APPLICATION OF LIBERTY §
UTILITIES (WOODMARK SEWER) §
CORP. AND LIBERTY UTILITIES §
(TALL TIMBERS SEWER) CORP. TO §
CHANGE RATES FOR SEWER §
SERVICES IN SMITH COUNTY, TEXAS §

BEFORE THE PUBLIC UTILITY

2017 JAN 10 PM 2:29
PUBLIC UTILITY COMMISSION
COMMISSION OF TEXAS

**LIBERTY'S RESPONSE TO COMMISSION STAFF'S
FIRST REQUEST FOR INFORMATION**

To: PUC Commission Staff, by and through its attorney of record, Sam Chang, Public Utility Commission of Texas, 1701 N. Congress Avenue, P.O. Box 13326, Austin, Texas 78711-3326.

Liberty Utilities (Tall Timbers Sewer) Corp. and Liberty Utilities (Woodmark Sewer) Corp. ("Liberty") provides this response to Commission Staff's First Requests for Information to Liberty. Liberty stipulates that the following response to requests for information may be treated by all parties as if the answer was filed under oath.

Respectfully submitted,

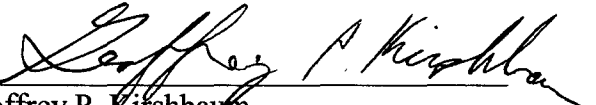
By: 
Geoffrey P. Kirshbaum
State Bar No. 24029665
TERRILL & WALDROP
810 West 10th Street
Austin, Texas 78701
Tel: (512) 474-9100
Fax: (512) 474-9888
gkirshbaum@terrillwaldrop.com

**ATTORNEYS FOR LIBERTY UTILITIES
(TALL TIMBERS SEWER) CORP. AND
LIBERTY UTILITIES (WOODMARK SEWER)
CORP.**

1443

CERTIFICATE OF SERVICE

I certify that a copy of this document will be served on all parties of record on January 10, 2017 in accordance with P.U.C. Procedural Rule 22.74.



Geoffrey P. Kirshbaum

RESPONSE TO REQUEST FOR INFORMATION

STAFF RFI 1-1 Provide copies of all Excel files, in working format, regarding Liberty Tall Timbers' and Liberty Woodmark's respective schedules in their application and accompanying testimony.

RESPONSE: Please see attached files
Staff 1-1 – Application – 8-28-16 – CORRECTED.xlsx
Staff 1-1 – Application – 10-13-16 TT.xlsx
Staff 1-1 – Application – 10-13-16 WM.xlsx
Staff 1-1 – Corrected Application Pages 10-13-16.xlsx
Staff 1-1 – Fairchild Schedules – 8-28-16.xlsx
Staff 1-1 – Fairchild Schedules – 10-13-16 TT.xlsx
Staff 1-1 – Fairchild Schedules – 10-13-16 WM.xlsx

Prepared and Sponsored by: Bruce H. Fairchild, FinCap

RESPONSE TO REQUEST FOR INFORMATION

STAFF RFI 1-2

With regard to the calculation of the proposed Base Equivalent Rate for the Liberty Tall Timbers system, provide the total connections or equivalencies for each category of customers listed below:

- a. Triplexes and Quadplexes
- b. Apartments and condos
- c. Mobile home park
- d. Transient mobile home park
- e. Schools with Showers
- f. Schools without Showers
- g. Hospitals
- h. Nursing Home
- i. Restaurants (fast food &/or disposals)
- j. Restaurant (sit down &/or dishwashers)
- k. Motel without restaurant
- l. Laundromat
- m. Commercial Laundry
- n. Retail Space
- o. Service station without bays
- p. Service station with bays
- q. Grocery without butcher
- r. Grocery with butcher
- s. Carwash self-service
- t. Churches
- u. Golf Course with showers
- v. Golf Course without shower

RESPONSE TO REQUEST FOR INFORMATION

RESPONSE:

a.	Triplexes and Quadplexes	0
b.	Apartments and condos	3
c.	Mobile home park	0
d.	Transient mobile home park	0
e.	Schools with Showers	0
f.	Schools without Showers	2
g.	Hospitals	0
h.	Nursing Home	1
i.	Restaurants (fast food &/or disposals)	2
j.	Restaurant (sit down &/or dishwashers)	9
k.	Motel without restaurant	0
l.	Laundromat	0
m.	Commercial Laundry	1
n.	Retail Space	43
o.	Service station without bays	0
p.	Service station with bays	0
q.	Grocery without butcher	0
r.	Grocery with butcher	0
s.	Carwash self-service	0
t.	Churches	3
u.	Golf Course with showers	0
v.	Golf Course without shower	0

Prepared by: Fatima Hameen, Finance Supervisor

Sponsored by: Crystal Green, Sr. Accounting Manager

RESPONSE TO REQUEST FOR INFORMATION

STAFF RFI 1-3 With regard to the Liberty Tall Timbers system, please provide the average annual flow for each category of customer listed below. These averages should be based on the test year data for Liberty Tall Timbers.

- a. Triplexes and Quadplexes
- b. Apartments and condos
- c. Mobile home park
- d. Transient mobile home park
- e. Schools with Showers
- f. Schools without Showers
- g. Hospitals
- h. Nursing Home
- i. Restaurants (fast food &/or disposals)
- j. Restaurant (sit down &/or dishwashers)
- k. Motel without restaurant
- l. Laundromat
- m. Commercial Laundry
- n. Retail Space
- o. Service station without bays
- p. Service station with bays
- q. Grocery without butcher
- r. Grocery with butcher
- s. Carwash self-service
- t. Churches
- u. Golf Course with showers
- v. Golf Course without shower

RESPONSE: Liberty Tall Timbers does not meter flow for specific categories of customers.

Prepared by: Beecher Vaillancourt, Operations Manager

Sponsored by: Matthew Garlick, President AZ/TX

RESPONSE TO REQUEST FOR INFORMATION

STAFF RFI 1-4

With regard to the calculation of the proposed Base Equivalent Rate for the Liberty Woodmark system, provide the total connections or equivalencies for each category of customer listed below:

- a. Triplexes and Quadplexes
- b. Apartments and condos with 5 or more units
- c. Mobile home park
- d. Transient mobile home park
- e. Schools with Showers
- f. Schools without Showers
- g. Hospitals
- h. Nursing Homes
- i. Restaurants (fast food &/or disposals)
- j. Restaurant (sit down &/or dishwashers)
- k. Motel without restaurant
- l. Laundromat
- m. Commercial Laundry
- n. Retail Space
- o. Service station without bays
- p. Service station with bays
- q. Grocery without butcher
- r. Grocery with butch
- s. Carwash self-service
- t. Churches
- u. Golf Course with showers
- v. Golf Course without shower

RESPONSE TO REQUEST FOR INFORMATION

RESPONSE:

a.	Triplexes and Quadplexes	0
b.	Apartments and condos	0
c.	Mobile home park	2
d.	Transient mobile home park	1
e.	Schools with Showers	0
f.	Schools without Showers	0
g.	Hospitals	0
h.	Nursing Home	0
i.	Restaurants (fast food &/or disposals)	0
j.	Restaurant (sit down &/or dishwashers)	2
k.	Motel without restaurant	0
l.	Laundromat	0
m.	Commercial Laundry	0
n.	Retail Space	15
o.	Service station without bays	0
p.	Service station with bays	0
q.	Grocery without butcher	0
r.	Grocery with butcher	0
s.	Carwash self-service	0
t.	Churches	5
u.	Golf Course with showers	0
v.	Golf Course without shower	1

Prepared by: Fatima Hameen, Finance Supervisor

Sponsored by: Crystal Green, Sr. Accounting Manager

RESPONSE TO REQUEST FOR INFORMATION

STAFF RFI 1-5 With regard to the Liberty Woodmark system, provide the average annual flow for each category of customer listed below. These averages should be based on the test year data for Liberty Woodmark.

- a. Triplexes and Quadplexes
- b. Apartments and condos with 5 or more units
- c. Mobile home park
- d. Transient mobile home park
- e. Schools with Showers
- f. Schools without Showers
- g. Hospitals
- h. Nursing Homes
- i. Restaurants (fast food &/or disposals)
- j. Restaurant (sit down &/or dishwashers)
- k. Motel without restaurant
- l. Laundromat
- m. Commercial Laundry
- n. Retail Space
- o. Service station without bays
- p. Service station with bays
- q. Grocery without butcher
- r. Grocery with butcher
- s. Carwash self-service
- t. Churches
- u. Golf Course with showers
- v. Golf Course without shower

RESPONSE: Liberty Woodmark does not meter flow for specific categories of customers.

Prepared by: Beecher Vaillancourt, Operations Manager

Sponsored by: Matthew Garlick, President AZ/TX

RESPONSE TO REQUEST FOR INFORMATION

STAFF RFI 1-6

Provide a copy of a Liberty Woodmark monthly sewage bill issued to each category of customer listed below during the test year:

- a. Triplexes and Quadplexes
- b. Apartments and condos with 5 or more units
- c. Mobile home park
- d. Transient mobile home park
- e. Schools with Showers
- f. Schools without Showers
- g. Hospitals
- h. Nursing Homes
- i. Restaurants (fast food &/or disposals)
- j. Restaurant (sit down &/or dishwashers)
- k. Motel without restaurant
- l. Laundromat
- m. Commercial Laundry
- n. Retail Space
- o. Service station without bays
- p. Service station with bays
- q. Grocery without butcher
- r. Grocery with butch
- s. Carwash self-service
- t. Churches
- u. Golf Course with showers
- v. Golf Course without shower

RESPONSE:

Please see attached file
Staff 1-6 Woodmark Bill Copies - CONFIDENTIAL.pdf

Prepared by: Kathy Medlin, Sr. Revenue Analyst

Sponsored by: Crystal Green, Sr. Accounting Manager

RESPONSE TO REQUEST FOR INFORMATION

STAFF RFI 1-7 Provide the overall number of Duplex units in the Liberty Tall Timbers system.

RESPONSE: There are 91 Duplex units in the Liberty Tall Timbers system at this time.

Prepared by: Fatima Hameen, Finance Supervisor

Sponsored by: Crystal Green, Sr. Accounting Manager

RESPONSE TO REQUEST FOR INFORMATION

STAFF RFI 1-8 Provide the overall number of Triplex units in the Liberty Tall Timbers system.

RESPONSE: The Company has none at this time.

Prepared by: Fatima Hameen, Finance Supervisor

Sponsored by: Crystal Green, Sr. Accounting Manager

RESPONSE TO REQUEST FOR INFORMATION

STAFF RFI 1-9. Provide the overall number of Quadplex units in the Liberty Tall Timbers system.

RESPONSE: The Company has none at this time.

Prepared by: Fatima Hameen, Finance Supervisor

Sponsored by: Crystal Green, Sr. Accounting Manager

RESPONSE TO REQUEST FOR INFORMATION

STAFF RFI 1-10 Provide the overall number of apartment complex units in the Liberty Tall Timbers system.

RESPONSE: There are 390 Apartment units in the Liberty Tall Timbers system at this time.

Prepared by: Fatima Hameen, Finance Supervisor

Sponsored by: Crystal Green, Sr. Accounting Manager

RESPONSE TO REQUEST FOR INFORMATION

STAFF RFI 1-11 Provide the overall number of condo units in the Liberty Tall Timbers system.

RESPONSE: The Company has none at this time.

Prepared by: Fatima Hameen, Finance Supervisor

Sponsored by: Crystal Green, Sr. Accounting Manager

RESPONSE TO REQUEST FOR INFORMATION

STAFF RFI 1-12 Provide the overall number of mobile home park spaces in the Liberty Tall Timbers system.

RESPONSE: The Company has none at this time.

Prepared by: Fatima Hameen, Finance Supervisor

Sponsored by: Crystal Green, Sr. Accounting Manager

RESPONSE TO REQUEST FOR INFORMATION

STAFF RFI 1-13 * Provide the overall number of transient mobile home park spaces in the Liberty Tall Timbers system.

RESPONSE: The Company has none at this time.

Prepared by: Fatima Hameen, Finance Supervisor

Sponsored by: Crystal Green, Sr. Accounting Manager

RESPONSE TO REQUEST FOR INFORMATION

STAFF RFI 1-14 Provide the overall number of schools with showers in the Liberty Tall Timbers system. Provide the total number of attendees in these schools.

RESPONSE: The Company has none at this time.

Prepared by: Fatima Hameen, Finance Supervisor

Sponsored by: Crystal Green, Sr. Accounting Manager

RESPONSE TO REQUEST FOR INFORMATION

STAFF RFI 1-15 Provide the overall number of schools without showers in the Liberty Tall Timbers system. Provide the total number of attendees in these schools.

RESPONSE: Two. Liberty Tall Timbers does not have any information on the actual number of attendees of any schools in the Company's service area. School administrators would be better able to provide such numbers. Under its tariff, Liberty Tall Timbers bills based on the following numbers of students:

Tyler Independent School	815	Students
Tyler Independent School	700	Students

Prepared by: Fatima Hameen, Finance Supervisor

Sponsored by: Crystal Green, Sr. Accounting Manager.

RESPONSE TO REQUEST FOR INFORMATION

STAFF RFI 1-16 Provide the total number of hospital beds in the Liberty Tall Timbers system. How was this number determined? How frequently is this number audited?

RESPONSE: The Company has none at this time.

Prepared by: Fatima Hameen, Finance Supervisor

Sponsored by: Crystal Green, Sr. Accounting Manager

RESPONSE TO REQUEST FOR INFORMATION

STAFF RFI 1-17 Provide the total number of nursing home beds in the Liberty Tall Timbers system. How was this number determined? How frequently is his number audited?

RESPONSE: There are 84 nursing home beds in the Liberty Tall Timbers system at this time. The bed count is determined at the time of service connection. This number has not been audited.

Prepared by: Fatima Hameen, Finance Supervisor

Sponsored by: Crystal Green, Sr. Accounting Manager

RESPONSE TO REQUEST FOR INFORMATION

STAFF RFI 1-18 Provide the water meter usage for each month of the test year used to determine the greater of: (a) 80 percent of the actual water meter usage of (b) the single family residence Base Equivalent Rate.

RESPONSE: The water data is collected by Southern Utilities and the City of Tyler. These utilities do not currently provide this information to Liberty Tall Timbers or Liberty Woodmark.

Prepared by: Fatima Hameen, Finance Supervisor

Sponsored by: Crystal Green, Sr. Accounting Manager

RESPONSE TO REQUEST FOR INFORMATION

STAFF RFI 1-19 Provide the number of tables in the restaurants (fast food &/or disposal) in the Liberty Tall Timbers system on a monthly basis.

RESPONSE: The number of tables for restaurants (fast food &/or disposal) is 4.21.

January	4.21
February	4.21
March	4.21
April	4.21
May	4.21
June	4.21
July	4.21
August	4.21
September	4.21
October	4.21
November	4.21
December	4.21

Prepared by: Fatima Hameen, Finance Supervisor

Sponsored by: Crystal Green, Sr. Accounting Manager

RESPONSE TO REQUEST FOR INFORMATION

STAFF RFI 1-20 Provide the number of tables in the restaurants (sit down &/or dishwashers) in the Liberty Tall Timbers system on a monthly basis.

RESPONSE: The number of tables for restaurants (fast food &/or disposal) is 144.84.

January	144.84
February	144.84
March	144.84
April	144.84
May	144.84
June	144.84
July	144.84
August	144.84
September	144.84
October	144.84
November	144.84
December	144.84

Prepared by: Fatima Hameen, Finance Supervisor

Sponsored by: Crystal Green, Sr. Accounting Manager

RESPONSE TO REQUEST FOR INFORMATION

STAFF RFI 1-21 Provide the total number of Motels without restaurants in the Liberty Tall Timbers system on a monthly basis. Provide the total number of units in each motel without a restaurant.

RESPONSE: The Company has none at this time.

Prepared by: Fatima Hameen, Finance Supervisor

Sponsored by: Crystal Green, Sr. Accounting Manager

RESPONSE TO REQUEST FOR INFORMATION

STAFF RFI 1-22 Provide the total number of Motels with restaurants in the Liberty Tall Timbers system. Provide the total number of units in each motel with a restaurant.

RESPONSE: The Company has none at this time.

Prepared by: Fatima Hameen, Finance Supervisor

Sponsored by: Crystal Green, Sr. Accounting Manager

RESPONSE TO REQUEST FOR INFORMATION

STAFF RFI 1-23 Provide the total number of Laundromat washers in the Liberty Tall Timbers system. How does Liberty Tall Timbers determine or track the total number of washers on a monthly basis?

RESPONSE: The Company has none at this time.

Prepared by: Fatima Hameen, Finance Supervisor

Sponsored by: Crystal Green, Sr. Accounting Manager

RESPONSE TO REQUEST FOR INFORMATION

STAFF RFI 1-24 Provide the total number of Commercial Laundry washers in the Liberty Tall Timbers system. How does Liberty Tall Timbers determine or track the total number or washers on a monthly basis?

RESPONSE: The total number of commercial laundry is 1. Liberty Tall Timbers determines the number of washers on the service connection date and records the multiplier in its billing system. Liberty Tall Timbers has not completed an audit at this time.

January	1
February	1
March	1
April	1
May	1
June	1
July	1
August	1
September	1
October	1
November	1
December	1

Prepared by: Fatima Hameen, Finance Supervisor

Sponsored by: Crystal Green, Sr. Accounting Manager

RESPONSE TO REQUEST FOR INFORMATION

STAFF RFI 1-25 Provide the total number of retail spaces in the Liberty Tall Timbers system.

RESPONSE: There are 43 retail spaces in the Tall Timbers system at this time.

Prepared by: Fatima Hameen, Finance Supervisor

Sponsored by: Crystal Green, Sr. Accounting Manager

RESPONSE TO REQUEST FOR INFORMATION

STAFF RFI 1-26 Provide the total number of service station facilities in the Liberty Tall Timbers system.

RESPONSE: The Company has none at this time.

Prepared by: Fatima Hameen, Finance Supervisor

Sponsored by: Crystal Green, Sr. Accounting Manager

RESPONSE TO REQUEST FOR INFORMATION

STAFF RFI 1-27 Provide the total number of service stations (with bays) facilities in the Liberty Tall Timbers system.

RESPONSE: The Company has none at this time.

Prepared by: Fatima Hameen, Finance Supervisor

Sponsored by: Crystal Green, Sr. Accounting Manager

RESPONSE TO REQUEST FOR INFORMATION

STAFF RFI 1-28 Provide the total number of grocery stores without butchers in the Liberty Tall Timbers system.

RESPONSE: The Company has none at this time.

Prepared by: Fatima Hameen, Finance Supervisor

Sponsored by: Crystal Green, Sr. Accounting Manager

RESPONSE TO REQUEST FOR INFORMATION

STAFF RFI 1-29 Provide the total number of grocery stores with butchers in the Liberty Tall Timbers system.

RESPONSE: The Company has none at this time.

Prepared by: Fatima Hameen, Finance Supervisor

Sponsored by: Crystal Green, Sr. Accounting Manager

RESPONSE TO REQUEST FOR INFORMATION

STAFF RFI 1-30 Provide the total number of carwash self-service bays in the Liberty Tall Timbers system. How does Liberty Tall Timbers determine the number of bays per each individual carwash?

RESPONSE: The Company has none at this time.

Prepared by: Fatima Hameen, Finance Supervisor

Sponsored by: Crystal Green, Sr. Accounting Manager

RESPONSE TO REQUEST FOR INFORMATION

STAFF RFI 1-31 Provide the total number of persons that attended church on a monthly basis in the Liberty Tall Timbers system. How does Liberty Tall Timbers track this data?

RESPONSE: The total number of persons attending church for billing purposes is 572. This amount is calculated at the time of service connection date using the maximum capacity allowed.

Prepared by: Fatima Hameen, Finance Supervisor

Sponsored by: Crystal Green, Sr. Accounting Manager

RESPONSE TO REQUEST FOR INFORMATION

STAFF RFI 1-32 Provide the total number of golfer that visited a golf course with showers on a monthly basis in the Liberty Tall Timbers system. How many of these golfers visited during the normal day hours of 8 A.M. to 1 P.M.?

RESPONSE: The Company does not serve any golf courses at this time.

Prepared by: Fatima Hameen, Finance Supervisor

Sponsored by: Crystal Green, Sr. Accounting Manager

RESPONSE TO REQUEST FOR INFORMATION

STAFF RFI 1-33 Provide the data on the total number of golfers that visited a golf course without showers on a monthly basis in the Liberty Tall Timbers system. How many of these golfers visited during the normal day hours of 8 A.M. to 1 P.M.?

RESPONSE: See response to Staff RFI 1-32 above.

Prepared by: Fatima Hameen, Finance Supervisor

Sponsored by: Crystal Green, Sr. Accounting Manager

RESPONSE TO REQUEST FOR INFORMATION

STAFF RFI 1-34 Refer to the Institutional section of Liberty Tall Timbers' proposed tariff (Bates No. LU 000604). For billing purposes, is the average number of attendees per school in the Liberty Tall Timbers system used to calculate the flat monthly rate? Or is each school required to provide the total number of attendees each month in order to calculate the flat monthly rate?

RESPONSE: Liberty Tall Timbers sets the total number of students at the time of the service connection date to calculate a flat rate.

Prepared by: Beecher Vaillancourt, Operations Manager

Sponsored by: Matthew Garlick, President AZ/TX

RESPONSE TO REQUEST FOR INFORMATION

STAFF RFI 1-35 Refer to Schedule III-3 in the application. Itemize all assets and provide Schedule III-3 in a workable Excel format. Provide the following information for each individual assets:

- a. NARUC Account Number
- b. Asset Number
- c. Description
- d. Date of Installation
- e. Service Life (years)
- f. Original Cost

RESPONSE: Please see attached files
Staff 1-35 - Tall Timbers Schedule III3 Plant Detail CWIP.xlsx
Staff 1-35 - Tall Timbers Schedule III3 Plant Detail.xlsx

Prepared by: Alysia Maya, Rate Analyst

Sponsored by: Gerry Becker, Manager of Rates and Regulatory

RESPONSE TO REQUEST FOR INFORMATION

STAFF RFI 1-36 Provide the overall number of Duplex units in the Liberty Woodmark system.

RESPONSE: There are 67 Duplex units in the Liberty Woodmark system at this time.

Prepared by: Fatima Hameen, Finance Supervisor

Sponsored by: Crystal Green, Sr. Accounting Manager

RESPONSE TO REQUEST FOR INFORMATION

STAFF RFI 1-37 Provide the overall number of mobile home park spaces in the Liberty Woodmark system.

RESPONSE: There are 81 mobile home park spaces in the Liberty Woodmark system at this time. Pinécrest Mobile Home has 37 spaces, and Piney Ridge Estates has 44 spaces.

Prepared by: Kathy Medlin, Sr. Revenue Analyst

Sponsored by: Crystal Green, Sr. Accounting Manager

RESPONSE TO REQUEST FOR INFORMATION

STAFF RFI 1-38 Provide the overall number of transient mobile home park spaces in the Liberty Woodmark system.

RESPONSE: There are 15 transient mobile home park spaces in the Liberty Woodmark system at this time. A-OK RV has 15 spaces

Prepared by: Kathy Medlin, Sr. Revenue Analyst

Sponsored by: Crystal Green, Sr. Accounting Manager

RESPONSE TO REQUEST FOR INFORMATION

STAFF RFI 1-39 Provide the overall number of schools with showers in the Liberty Woodmark system. Provide the total number of attendees in these schools.

RESPONSE: The Company has none at this time.

Prepared by: Fatima Hameen, Finance Supervisor

Sponsored by: Crystal Green, Sr. Accounting Manager

RESPONSE TO REQUEST FOR INFORMATION

STAFF RFI 1-40 Provide the overall number of hospital beds in the Liberty Woodmark system. How is this number determined? How frequently is this number audited by Liberty Woodmark?

RESPONSE: The Company has none at this time.

Prepared by: Fatima Hameen, Finance Supervisor

Sponsored by: Crystal Green, Sr. Accounting Manager

RESPONSE TO REQUEST FOR INFORMATION

STAFF RFI 1-41 Provide the overall number of nursing home beds in the Liberty Woodmark system. How was this number determined? How frequently is this number audited by Liberty Woodmark?

RESPONSE: The Company has none at this time.

Prepared by: Fatima Hameen, Finance Supervisor

Sponsored by: Crystal Green, Sr. Accounting Manager

RESPONSE TO REQUEST FOR INFORMATION

STAFF RFI 1-42 Provide the water meter usage for each month of the test year used to determine the greater of (a) 80 percent of the actual water meter usage or (b) the single family residence Base Equivalent Rate.

RESPONSE: The water data is collected by Southern Utilities and does not currently provide this information to Liberty Tall Timbers or Liberty Woodmark.

Prepared by: Fatima Hameen, Finance Supervisor

Sponsored by: Crystal Green, Sr. Accounting Manager

RESPONSE TO REQUEST FOR INFORMATION

STAFF RFI 1-43 Provide the number of tables in the restaurants (fast food &/or disposal) in the Liberty Woodmark system on a monthly basis.

RESPONSE: The Company has none at this time.

Prepared by: Fatima Hameen, Finance Supervisor

Sponsored by: Crystal Green, Sr. Accounting Manager

RESPONSE TO REQUEST FOR INFORMATION

STAFF RFI 1-44 Provide the number of tables in the restaurants (sit down &/or dishwasher) in the Liberty Woodmark system on a monthly basis.

RESPONSE: The total number of tables is 14.67.

January	14.67
February	14.67
March	14.67
April	14.67
May	14.67
June	14.67
July	14.67
August	14.67
September	14.67
October	14.67
November	14.67
December	14.67

Prepared by: Fatima Hameen, Finance Supervisor

Sponsored by: Crystal Green, Sr. Accounting Manager

RESPONSE TO REQUEST FOR INFORMATION

STAFF RFI 1-45 Provide the total number of Motels without restaurants in the Liberty Woodmark system on a monthly basis. Provide the total number of units in each motel without a restaurant.

RESPONSE: The Company has none at this time.

Prepared by: Fatima Hameen, Finance Supervisor

Sponsored by: Crystal Green, Sr. Accounting Manager

RESPONSE TO REQUEST FOR INFORMATION

STAFF RFI 1-46 Provide the total number of Motels with restaurants in the Liberty Woodmark system. Provide the total number of units in each motel with a restaurant.

RESPONSE: The Company has none at this time.

Prepared by: Fatima Hameen, Finance Supervisor

Sponsored by: Crystal Green, Sr. Accounting Manager

RESPONSE TO REQUEST FOR INFORMATION

STAFF RFI 1-47 Provide the total number of Laundromat washers in the Liberty Woodmark system. How does Liberty Woodmark determine or track the total number of washers on a monthly basis?

RESPONSE: The Company has none at this time.

Prepared by: Fatima Hameen, Finance Supervisor

Sponsored by: Crystal Green, Sr. Accounting Manager

RESPONSE TO REQUEST FOR INFORMATION

STAFF RFI 1-48 Provide the total number of Commercial Laundry washers in the Liberty Woodmark system. How does Liberty Woodmark determine or track the total number of washers on a monthly basis?

RESPONSE: The Company has none at this time.

Prepared by: Fatima Hameen, Finance Supervisor

Sponsored by: Crystal Green, Sr. Accounting Manager

RESPONSE TO REQUEST FOR INFORMATION

STAFF RFI 1-49 Provide the total number of retail spaces in the Liberty Woodmark system.

RESPONSE: There are 15 retail spaces in the Liberty Woodmark system at this time.

Prepared by: Fatima Hameen, Finance Supervisor

Sponsored by: Crystal Green, Sr. Accounting Manager

RESPONSE TO REQUEST FOR INFORMATION

STAFF RFI 1-50 Provide the total number of service station facilities in the Liberty Woodmark system.

RESPONSE: The Company has none at this time.

Prepared by: Fatima Hameen, Finance Supervisor

Sponsored by: Crystal Green, Sr. Accounting Manager

RESPONSE TO REQUEST FOR INFORMATION

STAFF RFI 1-51 Provide the total number of grocery stores without butchers in the Liberty Woodmark system.

RESPONSE: The Company has none at this time.

Prepared by: Fatima Hameen, Finance Supervisor

Sponsored by: Crystal Green, Sr. Accounting Manager

RESPONSE TO REQUEST FOR INFORMATION

STAFF RFI 1-52 Provide the total number of grocery stores with butchers in the Liberty Woodmark system.

RESPONSE: The Company has none at this time.

Prepared by: Fatima Hameen, Finance Supervisor

Sponsored by: Crystal Green, Sr. Accounting Manager

RESPONSE TO REQUEST FOR INFORMATION

STAFF RFI 1-53 Provide the total number of carwash self-service bays in the Liberty Woodmark system. How does Liberty Woodmark determine the number of bays per each individual carwash?

RESPONSE: The Company has none at this time.

Prepared by: Fatima Hameen, Finance Supervisor

Sponsored by: Crystal Green, Sr. Accounting Manager

RESPONSE TO REQUEST FOR INFORMATION

STAFF RFI 1-54 Provide the total number of persons that attended church on a monthly basis in the Liberty Woodmark system. How does Liberty Woodmark track this data?

RESPONSE: The total number of persons attending church for billing purposes is 1500. This amount is calculated at the time of service connection date using the maximum capacity allowed.

Prepared by: Fatima Hameen, Finance Supervisor

Sponsored by: Crystal Green, Sr. Accounting Manager

RESPONSE TO REQUEST FOR INFORMATION

STAFF RFI 1-55. Provide the total number of golfers that visited a golf course with showers on a monthly basis in the Liberty Woodmark system. How many of these golfers visited during the normal day hours of 8 A.M. to 1 P.M.?

RESPONSE: The Company has none at this time.

Prepared by: Fatima Hameen, Finance Supervisor

Sponsored by: Crystal Green, Sr. Accounting Manager

RESPONSE TO REQUEST FOR INFORMATION

STAFF RFI 1-56 Provide the data on the total number of golfers that visited a golf course without showers on a monthly basis in the Liberty Woodmark system. How many of these golfers visited during the normal day hours of 8 A.M. to 1 P.M.?

RESPONSE: The total number of billed golfers is 200. Applicants do not possess data concerning how many “golfers visited during the normal day hours of 8 A.M. to 1 P.M.”

Prepared by: Fatima Hameen, Finance Supervisor

Sponsored by: Crystal Green, Sr. Accounting Manager

RESPONSE TO REQUEST FOR INFORMATION

STAFF RFI 1-57 Refer to the Institutional section of Liberty Woodmark's proposed tariff (Bates No. LU 00607). For billing purposes, is the average number of attendees per school in the Liberty Woodmark system used to calculate the flat monthly rate? Or is each school required to provide the total number of attendees each month in order to calculate the flat monthly rate?

RESPONSE: Liberty Woodmark sets the total number of students at the time of the service connection date to calculate a flat rate.

Prepared by: Beecher Vaillancourt, Operations Manager

Sponsored by: Matthew Garlick, President AZ/TX

RESPONSE TO REQUEST FOR INFORMATION

STAFF RFI 1-58 Refer to Schedule III-3 in the application. Itemize all assets and provide Schedule III-3 in a workable Excel format. Provide the following information for each individual assets:

- a. NARUC Account Number
- b. Asset Number
- c. Description
- d. Date of Installation
- e. Service Life (years)
- f. Original Cost

RESPONSE: Please see attached files
Staff 1-58 - Woodmark Schedule III3 Plant Detail CWIP.xlsx
Staff 1-58 - Woodmark Schedule III3 Plant Detail.xlsx

Prepared by: Alysia Maya, Rate Analyst

Sponsored by: Gerry Becker, Manager of Rates and Regulatory