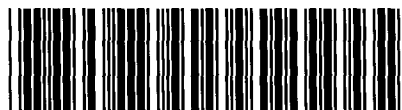




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Addendum StartPage: 0

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

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APPLICATION OF LIBERTY	§	BEFORE THE STATE OFFICE OF ADMINISTRATIVE HEARINGS
UTILITIES (WOODMARK SEWER)	§	
CORP. AND LIBERTY UTILITIES	§	
(TALL TIMBERS SEWER) CORP. TO	§	
CHANGE RATES FOR SEWER	§	
SERVICE IN SMITH COUNTY, TEXAS	§	

**OFFICE OF PUBLIC UTILITY COUNSEL'S  
FIRST REQUEST FOR INFORMATION TO  
LIBERTY UTILITIES (WOODMARK SEWER) CORP.  
AND LIBERTY UTILITIES (TALL TIMBERS SEWER) CORP.**

The Office of Public Utility Counsel (OPUC) files and submits this First Request for Information to Liberty Utilities (Woodmark Sewer) Corp. and Liberty Utilities (Tall Timbers Sewer) Corp. ("Liberty Utilities") in the captioned proceeding.<sup>1</sup>

Under Commission Procedural Rules 22.141-.145, 16 Tex. Admin. Code Ch. 22, OPUC requests that Liberty Utilities, as defined herein, provide the following information and answer the following questions under oath. Please answer the questions and sub-questions in the order in which they are listed and in sufficient detail to provide a complete and accurate answer to the question.

**Definitions**

As used in this introduction and in these questions,

(1) "Liberty Utilities", the "Company", and "Applicant" refer to Liberty Utilities (Woodmark Sewer) Corp. and Liberty Utilities (Tall Timbers Sewer) Corp. and its affiliates;

(2) "You", "yours" and "your" refer to Liberty Utilities (as defined above), including its directors, officers, employees, consultants, agents, and attorneys.

(3) "Document" and "documents" mean any written, recorded, filmed, or graphic matter, whether produced, reproduced, or on paper, cards, tapes, film, electronic facsimile, computer storage device or any other media, including, but not limited to, electronic mail (e-mail), memoranda, notes, analyses, minutes, records, photographs, correspondence, telegrams,

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<sup>1</sup> OPUC serves these requests subject to and without waiving its position that this case should be dismissed. Nothing stated or set out herein should be construed as an agreement that this case was properly filed.

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diaries, bookkeeping entries, financial statements, tax returns, checks, check stubs, reports, studies, charts, graphs, statements, notebooks, handwritten notes, applications, contracts, agreements, books, pamphlets, periodicals, appointment calendars, records and recordings of oral conversations, work papers, observations, commercial practice manuals, reports and summaries of interviews, reports of consultants, appraisals, forecasts, tape recordings, or any form of recording that is capable of being transcribed into written form.

### **Instructions**

1. The Definitions, Instructions, and Claim of Privilege set out in this Request for Information apply to these questions.
2. In answering these questions, furnish all information that is available to you, including information in the possession of your agents, employees, and representatives, all others from whom you may freely obtain it, and your attorneys and their investigators.
3. Please answer each question based upon your knowledge, information, or belief, and any answer that is based upon information or belief should state that it is given on that basis.
4. If you have possession, custody, or control (as defined by Tex. R. Civ. P. 192.7(b)) of the originals of these documents requested, please produce the originals or a complete copy of the originals and all copies that are different in any way from the original, whether by interlineation, receipt stamp, or notation.
5. If you do not have possession, custody, or control of the originals of the documents requested, please produce copies of the documents, however made, in your possession, custody, or control. If any document requested is not in your possession or subject to your control, please explain why not, and give the present location and custodian of any copy or summary of the document.
6. If any question appears confusing, please request clarification from the undersigned counsel.
7. In providing your responses, please start each response on a separate page and type, at the top of the page, the question that is being answered.
8. As part of the response to each question, please state, at the bottom of the answer, the name and job position of each person who participated in any way, other than providing clerical assistance, in the preparing of the answer. If the question has sub-parts, please identify the person or persons by sub-part. Please also state the name of the witness in this docket who

will sponsor the answer to the question and who can vouch for the truth of the answer. If the question has sub-parts, please identify the witness or witnesses by sub-part.

9. Rather than waiting to provide all of the responses at the same time, please provide individual responses as each becomes available.
10. These questions are continuing in nature. If there is a change in circumstances or facts or if you receive or generate additional information that changes your answer between the time of your original response and the time of the hearings, then you should submit, under oath, a supplemental response to your earlier answer.
11. If you consider any question to be unduly burdensome, or if the response would require the production of a voluminous amount of material, please call the undersigned counsel as soon as possible in order to discuss the situation and to try to resolve the problem. Likewise, if you object to any of the questions on the grounds that the question seeks confidential information, or on any other grounds, please call the undersigned counsel as soon as possible.
12. If the response to any question is voluminous, please provide separately an index to the materials contained in the response.
13. If the information requested is included in previously furnished exhibits, workpapers, or responses to other discovery inquiries or otherwise, in hard copy or electronic format, please furnish specific references thereto, including Bates Stamp page citations and detailed cross-references.
14. To the extent that a question asks for the production of copyrighted material, it is sufficient to provide a listing of such material, indicating the title, publisher, author, edition, and page references relied on or otherwise relevant to the question.

#### **Claim of Privilege**

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, recipients of copies, subject matter of the document, and the basis upon which such privilege is claimed.

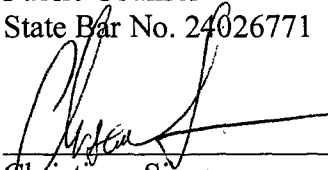
**SOAH Docket No. 473-17-1641.WS**  
**PUC Docket No. 46256**  
**OPUC's First Request For Information To**  
**Liberty Utilities (Woodmark Sewer) Corp.**  
**and Liberty Utilities (Tall Timbers Sewer) Corp.**

- 1-1. Please provide PFD and Commission Order setting rate base and accumulated depreciation for the Prior Rate Case as claimed in Table III-3(a) "Beginning Gross Plant Balance" and Table III-7 "Ending Prior Rate Case" for these systems.
- 1-2. Please provide a detailed listing of all assets included in the application including original cost of asset, service life, date of installation, and accumulated depreciation. Please make sure to provide an indication of which system each asset serves.
- 1-3. Please provide copies of all invoices, trending analyses, and documentation utilized to support the claimed asset values.
- 1-4. Please provide all analyses used by Liberty Utilities in arriving at the Base Equivalent Rate, and per unit conversions relied upon in the tariff in determining the fees charged to each customer classification type (such as a triplex is .68 per unit).
- 1-5. Please provide all analyses, facts and considerations that prove that these systems meet statutory requirements to qualify for multiple systems under a single tariff.
- 1-6. Please provide all studies, analysis, negotiations documentation, offers, and information pertaining to alternative service options evaluated by the utility in making decisions to increase capacity of infrastructure.
- 1-7. Please provide capacities (plant, pump, storage, etc) and line sizes (diameter and length) of all facilities claimed in the application.
- 1-8. Please provide maps of the systems that indicate the location of all facilities claimed in the application.
- 1-9. Please provide plat maps of the subdivisions served by the systems that indicate all current and future planned lots. Please provide the number of lots to be built out in each subdivision/section.
- 1-10. Please provide all regulatory Commission orders whereby the affiliated transactions/cost allocations of the parent company has been reviewed by other regulatory agencies of Liberty Utilities Affiliates.

January 30, 2017

Respectfully submitted,

Tonya Baer  
Public Counsel  
State Bar No. 24026771

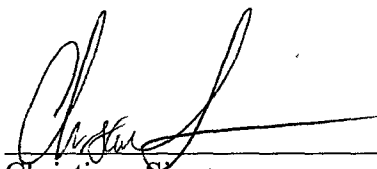
  
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Christiaan Siano  
Assistant Public Counsel  
State Bar No. 24051335

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opuc\_eservice@opuc.texas.gov (Service)

**CERTIFICATE OF SERVICE**

SOAH Docket No. 473-17-1641.WS  
PUC Docket No. 46256

I certify that today, January 30, 2017, I served a true copy of the foregoing Office of Public Utility Counsel's First Request for Information to Liberty Utilities (Woodmark Sewer) Corp. and Liberty Utilities (Tall Timbers Sewer) Corp. on all parties of record via United States First-Class Mail, hand-delivery or facsimile.

  
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Christiaan Siano