



Control Number: 46333



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SOAH DOCKET NO. 473-17-2285.WS  
PUC DOCKET NO. 46333

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APPLICATION OF PK-RE  
DEVELOPMENT COMPANY, INC.,  
D/B/A GREENSHORES UTILITY  
SERVICES AND D/B/A OAK SHORES  
WATER SYSTEM FOR AUTHORITY  
TO CHANGE RATES AND TARIFFS IN  
TRAVIS COUNTY

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BEFORE THE STATE OFFICE  
PUBLIC UTILITY COMMISSION  
FILING CLERK

OF

ADMINISTRATIVE HEARINGS

COMMISSION STAFF'S THIRD REQUEST FOR INFORMATION  
TO PK-RE DEVELOPMENT COMPANY, INC. D/B/A  
GREENSHORES UTILITY SERVICES, AND  
D/B/A OAK SHORES WATER SYSTEM (PK-RE)  
QUESTION NOS. STAFF 3-1 THROUGH 3-21

Pursuant to 16 Tex. Admin. Code Ann. § 22.144 (TAC), the Staff of the Public Utility Commission of Texas (Staff) requests that PK-RE Development Company, Inc., d/b/a Greenshores Utility Services and d/b/a Oak Shores Water System (PK-RE) 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 78711-3326.

146


**Dated: May 11, 2017**

Respectfully Submitted,

**PUBLIC UTILITY COMMISSION OF TEXAS  
LEGAL DIVISION**

Margaret Uhlig Pemberton  
Division Director

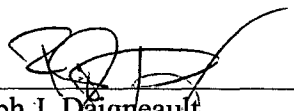
Karen S. Hubbard  
Managing Attorney

  
\_\_\_\_\_  
Ralph J. Daigneault  
State Bar No. 24040755  
1701 N. Congress Avenue  
P.O. Box 13326  
Austin, Texas 78711-3326  
(512) 936-7348  
(512) 936-7268 (facsimile)

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**CERTIFICATE OF SERVICE**

I certify that a copy of this document will be served on all parties of record on May 11, 2017, in accordance with 16 TAC § 22.74.

  
\_\_\_\_\_  
Ralph J. Daigneault

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GREENSHORES UTILITY SERVICES, AND  
D/B/A OAK SHORES WATER SYSTEM (PK-RE)  
QUESTION NOS. STAFF 3-1 THROUGH 3-21**

**DEFINITIONS**

- A. "PK-RE" or "Company" refers to the PK-RE Development Company, Inc., d/b/a Greenshores Utility Services and d/b/a Oak Shores Water System 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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GREENSHORES UTILITY SERVICES, AND  
D/B/A OAK SHORES WATER SYSTEM (PK-RE)  
QUESTION NOS. STAFF 3-1 THROUGH 3-21**

**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 3-1 THROUGH 3-21**

- Staff 3-1      Provide a full organizational structure for PK-RE, and all affiliated companies.
- Staff 3-2      Provide any and all affiliated interest agreements between the utility and affiliated companies.
- Staff 3-3      Provide the organizational structure showing how RME Enterprises, Inc. is affiliated with the utility company.
- Staff 3-4      If RME Enterprises, Inc. owned, directly or indirectly, the utility, advise if a stock transfer was filed to sell RME Enterprises, Inc. to a third party.
- Staff 3-5      Reference the response to Staff 1-2 and 1-26. Provide the following:
- a. Electric invoices for account number 166524000:
    - i. Dated December 2015 (For usage in November); and
    - ii. Dated January 2016 (For usage in December).
  - b. Electric invoices for account number 486524000:
    - i. For usage in April 2015;
    - ii. For usage in November 2015; and
    - iii. For usage in December 2015.
  - c. Electric invoices for account number 548445000 for usage in December 2015.
  - d. Electric invoices for account number 366524000:
    - i. For usage in August 2015; and
    - ii. For usage in December 2015.
  - e. Calculation and supporting documentation of how the electric expense was divided between water and sewer.
- Staff 3-6      Reference the response to Staff 1-5. Provide the supporting documentation/calculation of how the expenses were divided in a 62.55%/37.45% split between water and sewer.

- Staff 3-7 Reference the response to Staff 1-6, 1-31, 1-7 and 1-32. Provide the contract with the utility and:
- a. AWR services, Inc; and
  - b. Spicewood Utility Services.
- Staff 3-8 Reference the response to Staff 1-6, 1-31, 1-7 and 1-32. Provide any and all invoices with Crossroads Utility Services between November 30, 2015 and November 30, 2016.
- Staff 3-9 Reference the response to Staff 1-13. Provide the invoices for the record keeping fees of \$750 from Eppright Homes, LLC.
- Staff 3-10 Reference the response to Staff 1-13 and the contract in Staff 1-6. Provide an explanation of how the record keeping stated in response to Staff 1-13 are different from record keeping included in the contract in response to Staff 1-6. Include job descriptions for both job positions.
- Staff 3-11 Reference the response to Staff 1-13. Provide the supporting documentation/calculation of how the expenses were divided/allocated between water and sewer.
- Staff 3-12 Reference the response to Staff 1-14 and 1-39. Provide the declaration page, or insurance policy which shows what is covered.
- Staff 3-13 Reference the response to Staff 1-15 and 1-40. Provide the invoices for the Consolidated Water fee for:
- a. Invoice dated October 31, 2013; and
  - b. Invoice dated October 31, 2016.
- Staff 3-14 Reference the response to Staff 1-17. Provide all invoices, including descriptions, of all claimed bank fees.
- Staff 3-15 Reference the response to Staff 1-17. Provide the supporting documentation/calculation of how the expenses were divided/allocated between water and sewer.
- Staff 3-16 Reference the response to Staff 1-18 and 1-43. For account number 512-340-0052 989 4, provide all pages of the telephone bill.
- Staff 3-17 Reference the response to Staff 1-18 and 1-43. Provide all supporting documentation/calculation of how the expenses were divided/allocated between water and sewer.
- Staff 3-18 Reference the response to Staff 1-18 and 1-43. Provide the gas bills for 2015.

- Staff 3-19      Reference the response to Staff 1-19. Provide supporting documentation/calculation of how the capital structure of 46.57% debt and 53.43% equity was determined.
- Staff 3-20      Reference the response to Staff 1-30. Provide invoices for the sludge hauling for the 2015 test year.
- Staff 3-21      Please advise if the customers in the subdivision where Sludge hauling is necessary from the lift station are paying PK-RE's tariffed rates.