



Control Number: 46333



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

RECEIVED  
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PUBLIC UTILITY COMMISSION  
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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

OF

ADMINISTRATIVE HEARINGS

COMMISSION STAFF'S FOURTH 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 4-1 THROUGH 4-8

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.

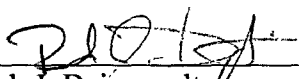
**Dated: May 19, 2017**

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 19, 2017, in accordance with 16 TAC § 22.74.

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

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TO PK-RE DEVELOPMENT COMPANY, INC. D/B/A  
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D/B/A OAK SHORES WATER SYSTEM (PK-RE)  
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**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 4-1 THROUGH 4-8**

**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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- Staff 4-1      Provide the general ledger for the test year ending December 31, 2015.
- Staff 4-2      Reference response to Staff RFI 1-20 and 1-46. Provide the documents listed in this repose in this docket.
- Staff 4-3      Reference response to Staff RFI 1-5, 1-7, 1-29, and 1-32. Provide the following bills from Brenntag:
- a. 4/30/2015 invoice for Ammonium Sulfate in the amount of 465.12;
  - b. 8/31/2015 invoice for Chlorine in the amount of \$323.69;
  - c. 9/1/2015 invoice for Ammonium Sulfate in the amount of \$466.36;
  - d. 10/20/2015 invoice for Ammonium Sulfate and Chorine in the amount of \$783.74;
  - e. 10/19/2015 invoice for Chlorine in the amount of \$284.04; and
  - f. 12/30/2015 invoice for Ammonium Sulfate and Chlorine in the amount of \$1,475.08.
- Staff 4-4      Reference response to Staff RFI 1-7 and 1-32. Provide the following:
- a. Invoices for sampling in the months of August 2015 through December 2015; and
  - b. Explanation why some sampling fees are charged 15% extra, and some sampling fees are at the invoiced amount.
- Staff 4-5      Reference response to Staff RFI 1-7 and 1-32. Provide the following:
- a. An explanation for switching from AWR Services, Inc.;
  - b. The differences in base services from AWR Services, Inc. and Spicewood Utility Services; and
  - c. If any other service company estimates were reviewed for reasonable pricing;
  - d. Invoice for March from AWR Services; and
  - e. Invoice for September from AWR Services (or Spicewood Utility Services if they were the operator in September).
- Staff 4-6      Reference the response to Staff 1-7 and 1-32, Bates page PK-RE 001319. Advise the amount reimbursed by the customer for fixing their customer service line.

- Staff 4-7 Reference the response to Staff 1-7 and 1-32 (Invoices for 2015); invoices from Home Depot Commercial Account. List the items that have been put in use, and which (if any) items are still in inventory.
- Staff 4-8 Reference the Direct Testimony of Georgia N. Crump, page 4, lines 11-13. Provide the March 24, 2016 letter agreement.

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