

Control Number: 46674



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RECEIVED

APPLICATION OF SUBURBAN  
UTILITY COMPANY, INC. FOR  
RATE/TARIFF CHANGE

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PUBLIC UTILITY COMMISSION

2017 JAN 19 PM 12:00

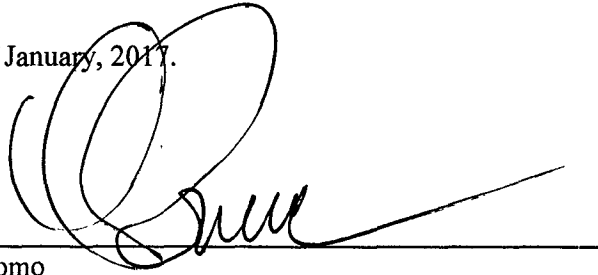
OF TEXAS

PUBLIC UTILITY COMMISSION  
FILING CLERK

**SUBURBAN UTILITY COMPANY, INC.'s RESPONSES TO OFFICE OF  
PUBLIC UTILITY COUNSEL'S FIRST REQUEST FOR ADMISSIONS  
REQUESTS FOR ADMISSIONS 1-1 THROUGH 1-8**

Pursuant to Chapter 16, et. seq. of the Texas Administrative Code, §22.144 ("TAC"), and Rules 190-198 of the Texas Rules of Civil Procedure, SUBURBAN UTILITY COMPANY, INC. ("SUBURBAN") hereby submits and serves these responses to the Office of Public Utility Counsel's ("OPUC") First Request for Admissions to SUBURBAN only to the Request for Information, Requests for Admissions 1-1 through 1-8. SUBURBAN will supplement its responses should it become aware of any additional responsive information.

Respectfully submitted this 19<sup>th</sup> day of January, 2017.



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ATTORNEY FOR SUBURBAN UTILITY COMPANY, INC.

**CERTIFICATE OF SERVICE**

I hereby certify that a true and correct copy of the foregoing and the following Responses to the

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OPUC's First Request for Admissions, Requests for Admissions 1-1 through 1-8 were served on the known parties to date on the 19<sup>th</sup> day of January, 2017 by either First Class Mail, or Facsimile Transmission delivery.



Les Romo

**SUBURBAN UTILITY COMPANY, INC.'s RESPONSES  
TO OPUC's FIRST REQUEST FOR ADMISSIONS  
REQUESTS FOR ADMISSIONS 1-1 THROUGH 1-8**

**GENERAL OBJECTIONS:**

SUBURBAN objects to:

(1) any request that refers to documents, materials, matters, facts, events and information that are not relevant to the issues in this case and/or which will not lead to the discovery of relevant information.

(2) any request that seeks information, documents and materials that cover the time period that is beyond the test year in this case, and that is beyond the period of known and measurable changes in this proceeding.

The General Objections apply to each and every Response by SUBURBAN to the OPUC's First Request for Information as if set forth fully within each Response.

**CONDITIONS TO RESPONSE:**

1. SUBURBAN's responses are based on the present knowledge of its directors, managers and officers, after a reasonable investigation and a reasonable interpretation and construction of the request in providing these responses.

2. SUBURBAN reserves the right to redact any portion(s) of otherwise responsive and non-privileged documents that contain irrelevant, non-responsive or privileged information.

3. SUBURBAN will supplement its responses if, and when such may be required by applicable discovery rules to this case, if necessary.

4. Any responses that SUBURBAN will produce documents and/or materials are limited in scope to the degree that the documents and/or materials exist, and are in the possession and/or control of SUBURBAN and/or reasonably available to SUBURBAN

Without waiving the above-stated objections, and subject to the afore-said objections and conditions SUBURBAN responds to the OPUC's Request for Information, Requests for Admissions 1-1 through 1-8 as follows:

**RFA No. 1-1** Admit that you are an affiliated company of M.B.C. Water Services.

RESPONSE: OBJECTION: This requests information that is not relevant to this proceeding, nor will it reasonably lead to relevant information. Without waiving this Objection, SUBURBAN Replies: **DENY**.

**RFA No. 1-2** Admit that you are an affiliated company of Consumers Water, Inc.

RESPONSE: OBJECTION: This requests information that is not relevant to this proceeding, nor will it reasonably lead to relevant information. Without waiving this Objection, SUBURBAN Replies: **ADMIT**.

**RFA No. 1-3** Admit that you are an affiliated company of Community Utility Company.

RESPONSE: OBJECTION: This requests information that is not relevant to this proceeding, nor will it reasonably lead to relevant information. Without waiving this Objection, SUBURBAN Replies: **ADMIT**.

**RFA No. 1-4** Admit that you are an affiliated company of Patton Village Water Company, Inc.

RESPONSE: OBJECTION: This requests information that is not relevant to this proceeding, nor will it reasonably lead to relevant information. Without waiving this Objection, SUBURBAN Replies: **DENY**.

**RFA No. 1-5** Admit that you are an affiliated company of Stone Hedge Utility Company, Inc.

RESPONSE: OBJECTION: This requests information that is not relevant to this proceeding, nor will it reasonably lead to relevant information. Without waiving this Objection, SUBURBAN Replies: **DENY**.

**RFA No. 1-6** Admit that the current owners of Suburban Utility Company, Inc. acquired ownership of it and its system through inheritance.

RESPONSE: **ADMIT**, in part, and **DENY**, in part.

**RFA No. 1-7** Admit that you, M.B.C. Water Systems, Inc., Community Utility Co., Consumers Water, Inc. Patton Village Water, Stonehedge Utility, and your other affiliates use the same office.

RESPONSE: **ADMIT**, in part, and **DENY**, in part.

**RFA No. 1-8** Admit that you are required to provide continuous and adequate service.

RESPONSE: **ADMIT**.

STATE OF TEXAS

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COUNTY OF MONTGOMERY

I hereby verify that I have read the foregoing Suburban Utility Company, Inc.'s responses to the OPUC Request for Information, Request for Admissions 1-1 through 1-8, and the responses are true and correct to the best of my knowledge and belief.

Mitchell M. Martin, Jr.  
Mitchell M. Martin, Jr.

17<sup>th</sup> day of January, 2017, by Mitchell M. Martin, Jr.,



Janet M. Wisnowski  
Notary Public, in and for the  
State of Texas