



Control Number: 46674



Item Number: 232

Addendum StartPage: 0

DOCKET NO. 46674

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

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PUBLIC UTILITY  
COMMISSION OF TEXAS  
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**COMMISSION STAFF'S FIRST REQUEST FOR INFORMATION TO  
SUBURBAN UTILITY COMPANY, INC.  
STAFF RFI NO. 1-1 THROUGH NO. 1-2**

To: Suburban Utility Company, Inc., through its counsel of record, Les Romo, Law Offices of  
Les Romo, 102 West Morrow Street, Suite 202, Georgetown, Texas 78627

Commission Staff of the Public Utility Commission of Texas requests that Suburban Utility  
Company, Inc. provide responses and produce documents in response to Staff's First Request for  
Information.

Provide an original and three (3) copies of your responses to:

Public Utility Commission of Texas  
Attention: Filing Clerk  
1701 N. Congress Avenue  
P.O. Box 13326  
Austin, Texas 78711-3326

232

Date: January 26, 2017

Respectfully Submitted,

**PUBLIC UTILITY COMMISSION OF  
TEXAS LEGAL DIVISION**

Margaret Uhlig Pemberton  
Division Director  
Legal Division

Katherine Gross  
Managing Attorney  
Legal Division



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Sam Chang  
State Bar No. 24078333  
Public Utility Commission of Texas  
1701 N. Congress Avenue  
P.O. Box 13326  
Austin, Texas 78711-3326  
(512) 936-7261  
(512) 936-7268 (facsimile)  
sam.chang@puc.texas.gov

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**CERTIFICATE OF SERVICE**

I certify that a copy of this document was served on all parties of record on January 26, 2017, in accordance with 16 TAC § 22.74.



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Sam Chang

**COMMISSION STAFF'S FIRST REQUEST FOR INFORMATION TO  
SUBURBAN UTILITY COMPANY, INC.  
STAFF RFI NO. 1-1 THROUGH NO. 1-2**

**INSTRUCTIONS**

1. Suburban Utility's responses to Staff's 1st RFI shall be provided within the time limit provided by the presiding officer or, if the presiding officer has not provided a time limit, within twenty (20) days.
2. Suburban Utility's responses to Staff's 1st RFI shall be in sufficient detail to fully present all of the relevant facts.
3. Each response must be made under oath and identify the person that prepared the response or the person under whose direct supervision the response was prepared. Additionally, each response must also identify the sponsoring witness, if any.
4. Copy the specific question or document request immediately above each response. With respect to the production of documents, indicate the specific document request(s) to which the documents are being produced.
5. Suburban Utility has a continuing duty to supplement its responses to Staff's 1st RFI if it acquires information upon the basis of which it knows or should know that the response was incorrect or incomplete when made or though correct or complete when made, is materially incorrect or incomplete. Suburban Utility shall amend its prior response within five (5) working days of acquiring the information.
6. If any responsive Document, Electronically Stored Information, or tangible item is withheld under any claim of privilege, provide a privilege log identifying each Document for which a privilege is claimed, together with the following information:
  - a. Date of the Document was created;
  - b. Subject matter of the Document; and
  - c. The basis upon which such privilege is claimed.
7. Electronically Stored Information and Documents in an electronic format shall be produced with metadata intact. Electronic spreadsheets shall be produced with all formulas, linked cells, and linked spreadsheets intact.
8. If the response to any request is voluminous, provide a detailed index of the voluminous material and the means by which Staff may obtain the voluminous material.
9. 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.

10. The present tense shall be construed to include the past tense, and the past tense shall be construed to include the present tense.
11. The terms "and" and "or" shall be construed as either conjunctive or conjunctive as necessary to make the request inclusive rather than exclusive
12. Documents produced in response to Staff's 1st RFI shall be Bates labeled.

**COMMISSION STAFF'S FIRST REQUEST FOR INFORMATION TO  
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STAFF RFI NO. 1-1 THROUGH NO. 1-2**

**DEFINITIONS**

1. "Suburban Utility" means Suburban Utility Company, Inc. and any entity or person acting or purporting to act on its behalf, including without limitation, attorneys, agents, advisors, investigators, representatives, employees, independent contractors, or other persons.
2. "Commission" means the Public Utility Commission of Texas.
3. "Document" is used in its broadest sense to include, by way of illustration and not limitation, all written or graphic matter of every kind and description, whether printed, produced, or reproduced by any process (visually, magnetically, mechanically, electronically, or by hand); whether a final draft, initial draft, original copy, or reproduction; whether claimed as privileged or otherwise excludable from discovery; and whether or not in your actual or constructive possession, custody, or control. The term includes any written, recorded, or graphic matter, however produced or reproduced, including but not limited to Electronically Stored Information, correspondence, e-mails, telegrams, contracts, agreements, notes in any form, memoranda, reports, invoices, ledgers, spreadsheets, data, models, diaries, compilations, voice recording tapes, microfilms, pictures, computer media, workpapers, 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.
4. "Electronically Stored Information" means data that is created, altered, communicated, and stored in digital form.
5. "Regarding" includes the following meanings: relating to, pertaining to, concerning, discussing, mentioning, containing, reflecting, evidencing, describing, showing, identifying, providing, disproving, consisting of, supporting, or contracting in any way legally, logically, or factually connected with the matter to which the term refers or having a tendency to prove or disprove the matter to which the term refers.

**COMMISSION STAFF'S FIRST REQUEST FOR INFORMATION TO  
SUBURBAN UTILITY COMPANY, INC.  
STAFF RFI NO. 1-1 THROUGH NO. 1-2**

- STAFF RFI  
NO. 1-1** Explain how Suburban Utility determined a 10% return on equity. Provide Documents that support or provide the basis for Suburban Utility's determination of a 10% return on equity.
- STAFF RFI  
NO. 1-2** For each of the Beaumont Place (PWS ID: 1010098), Cypress Bend (PWS ID: 1010119), and Reservoir Acres (PWS ID: 1010197) water systems:
- a. Provide a copy of the most recent Comprehensive Compliance Investigation from the Texas Commission on Environmental Quality.
  - b. Provide construction approval letters from the Texas Commission on Environmental Quality for equipment installed subsequent to Suburban Utility's previously-approved rate case.