



Control Number: 46674



Item Number: 307

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**SOAH DOCKET NO. 473-17-2457.WS  
PUC DOCKET NO. 46674**

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**APPLICATION OF SUBURBAN  
UTILITY COMPANY, INC. FOR  
AUTHORITY TO CHANGE RATES**

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§  
§

**BEFORE THE STATE OFFICE  
OF PUBLIC UTILITY COMMISSION  
ADMINISTRATIVE HEARINGS**

FILED CLERK

**COMMISSION STAFF'S RESPONSE  
TO SUBURBAN UTILITY COMPANY, INC. (SUBURBAN)  
FIRST REQUEST FOR INFORMATION,  
REQUEST FOR PRODUCTION,  
AND REQUEST FOR DISCLOSURE**

The Staff of the Public Utility Commission of Texas (Staff) stipulates that the following response(s) to request(s) for information/production/disclosure may be treated by all parties as if the answers were filed under oath.

307

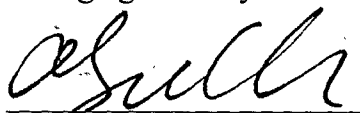
**DATED: March 9, 2017**

Respectfully Submitted,

**PUBLIC UTILITY COMMISSION OF TEXAS  
LEGAL DIVISION**

Margaret Uhlig Pemberton  
Division Director

Stephen Mack  
Managing Attorney



A. J. Smullen  
State Bar No. 24083881  
1701 N. Congress Avenue  
P.O. Box 13326  
Austin, Texas 78711-3326  
(512) 936-7289  
(512) 936-7268 (facsimile)  
aj.smullen@puc.texas.gov

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**CERTIFICATE OF SERVICE**

I certify that a copy of this document will be served on all parties of record March 9, 2017,  
in accordance with 16 TAC § 22.74.



A. J. Smullen

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**COMMISSION STAFF'S RESPONSE  
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**RFI 1-1**

Please indicate whether or not the water rate structure proposed in SUBURBAN's Rate/Tariff Change Application are appropriate. If not, what rate structure do you claim would be appropriate.

**RESPONSE:**

Staff provides this response subject to and without waiving its previously filed objections.

Staff has not developed its position on this issue at this time. Staff will supplement this response, if necessary, after its direct testimony is filed to the extent responsive information is not contained in its pre-filed testimony.

Prepared by: Counsel  
Sponsor: Counsel

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**RFI 1-2**

Please indicate if SUBURBAN should be allowed to recover reasonable and necessary rate case expenses in addition to its cost of service requested. Does the PUC agree that reasonable and necessary rate case expense should be recovered in the form of a monthly surcharge charged to the customers in addition to any cost of service? If not, what form should be used to recover reasonable and necessary rate case expense.

**RESPONSE:**

Staff provides this response subject to and without waiving its previously filed objections.

Staff has not developed its position on this issue at this time. Staff will supplement this response, if necessary, after its direct testimony is filed to the extent responsive information is not contained in its pre-filed testimony.

Prepared by: Counsel  
Sponsor: Counsel

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**RFI 1-3**

Please identify if the PUC and its Staff is recommending disallowance of any expenses included in the cost of service, please provide the name and amount of each expense for which the OPUC and its Staff recommends a change and the specific reasons for disallowing any expense.

**RESPONSE:**

Staff provides this response subject to and without waiving its previously filed objections.

Staff has not developed its position on this issue at this time. Staff will supplement this response, if necessary, after its direct testimony is filed to the extent responsive information is not contained in its pre-filed testimony to the extent responsive information is not contained in its pre-filed testimony.

Prepared by: Counsel  
Sponsor: Counsel

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**RFI 1-4**

Please indicate what measures the PUC and its Staff have taken in their analysis to fix an overall level of revenue that will permit SUBURBAN a reasonable opportunity to earn a reasonable return on its invested capital used and useful in rendering service to the public over and above its reasonable and necessary operating expenses and will preserve the financial integrity of this utility as provided for in the Texas Water Code § 13.183.

**RESPONSE:**

Staff provides this response subject to and without waiving its previously filed objections.

Staff intends, consistent with TWC § 13.183(a), to recommend an overall revenue requirement that will provide Suburban a reasonable opportunity to recover its reasonable and necessary operating expenses, as demonstrated by Suburban consistent with its burden of proof, as well as a reasonable return on invested capital.

Prepared by: Counsel  
Sponsor: Counsel

**SOAH DOCKET NO. 473-17-2457.WS  
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**RFI 1-5**

If the percentage rate of return that the PUC and its Staff recommends is different from what appears in SUBURBAN's Rate/Tariff Change Application, please indicate the reasons for the difference and the amount of the difference.

**RESPONSE:**

Staff provides this response subject to and without waiving its previously filed objections.

Staff has not developed its position on this issue at this time. Staff will supplement this response, if necessary, after its direct testimony is filed to the extent responsive information is not contained in its pre-filed testimony.

Prepared by: Counsel  
Sponsor: Counsel



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**RFI 1-6**

If the net invested capital, or rate base, that the PUC and its staff recommends is different from what appears in SUBURBAN' s Rate/Tariff Change Application, please indicate the reasons for the difference and the amount of the difference.

**RESPONSE:**

Staff provides this response subject to and without waiving its previously filed objections.

Staff has not developed its position on this issue at this time. Staff will supplement this response, if necessary, after its direct testimony is filed to the extent responsive information is not contained in its pre-filed testimony.

Prepared by: Counsel  
Sponsor: Counsel

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**RFI 1-7**

Please indicate any quality of service concerns the PUC and its Staff have with the water service provided by SUBURBAN. Please identify each specific concern by indicating exactly what is the concern, the exact location of the concern and the length of time the quality of service concern has been occurring.

**RESPONSE:**

Staff provides this response subject to and without waiving its previously filed objections.

Staff has not developed its position on this issue at this time. Staff will supplement this response, if necessary, after its direct testimony is filed to the extent responsive information is not contained in its pre-filed testimony.

Prepared by: Counsel  
Sponsor: Counsel

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**RFI 1-8**

If the PUC and its staff is recommending that SUBURBAN not be allowed to recover the revenue requirement to perform necessary operational and billing services, please explain how SUBURBAN will be able to provide continuous and adequate service to its customers both current and future, if this recommendation is adopted by the SOAH ALJ and by the PUC.

**RESPONSE:**

Staff provides this response subject to and without waiving its previously filed objections.

Staff has not developed its position on this issue at this time. Staff will supplement this response, if necessary, after its direct testimony is filed to the extent responsive information is not contained in its pre-filed testimony.

Prepared by: Counsel  
Sponsor: Counsel

**SOAH DOCKET NO. 473-17-2457.WS**

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**RFI 1-9**

Please provide the underlying rules, and provisions of the Texas Water Code, if any, as well as all other legal precedent, law or rule that you claim supports the use of data outside the test year and period of known and measurable change to determine the appropriate rate of return for an investor owned utility regulated by the PUC in the State of Texas if such claims are being made by the PUC, or if the PUC plans to make such claims.

**RESPONSE:**

Staff provides this response subject to and without waiving its previously filed objections.

Staff has conferred with counsel regarding this request. Due to the breadth of precedent supporting the analysis of information pertaining to a barometer group (or proxy group), including information from beyond the test year, throughout the United States, including at the Public Utility Commission of Texas and federal regulatory agencies, Staff will not be required to provide an extensive listing of relevant legal precedents. Although this is not an exhaustive list of examples, Staff notes that such analysis was used by Staff and other parties recently in Docket Nos. 45418 and 45570.

Prepared by: Counsel  
Sponsor: Emily Sears

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**RFI 1-10**

Please provide the underlying rules, and provisions of the Texas Water Code, if any, as well as any other legal precedent, law or rule that you claim supports any claim by the PUC that the proposed Capital Improvement Surcharge is not reasonable and necessary to provide facilities capable of providing adequate and continuous service by SUBURBAN to its customers.

**RESPONSE:**

Staff provides this response subject to and without waiving its previously filed objections.

Staff has not developed its position on this issue at this time. Preliminarily, Staff identifies Tex. Water Code § 13.183(b) and 16 Tex. Admin. Code § 24.22(f). Staff will supplement this response, if necessary, after its direct testimony is filed to the extent responsive information is not contained in its pre-filed testimony.

Prepared by: Counsel  
Sponsor: Counsel

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**RFI 1-11**

Please explain in detail how SUBURBAN's capital structure is atypical of other regulated investor owned utilities in the State of Texas, and give specific examples to support this testimony if the PUC is making or plans to make such claim.

**RESPONSE:**

Staff provides this response subject to and without waiving its previously filed objections.

Staff has not developed its position on this issue at this time. Staff will supplement this response after its direct testimony is filed. to the extent responsive information is not contained in its pre-filed testimony.

Prepared by: Counsel  
Sponsor: Counsel

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**RFI 1-12**

Please identify each component of SUBURBAN as set forth in its proposed plan of improvements, repairs and upgrades that the PUC claims is not necessary and/or needed in order for the company to provide continuous and adequate water service to its customers.

**RESPONSE:**

Staff provides this response subject to and without waiving its previously filed objections.

Staff has not developed its position on this issue at this time. Staff will supplement this response after its direct testimony is filed to the extent responsive information is not contained in its pre-filed testimony.

Prepared by: Counsel  
Sponsor: Counsel

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**RFI 1-13**

Provide the sources of funding that the PUC and its Staff claim are available to SUBURBAN in order for the company to pay for the water system improvements, upgrades and repairs as set forth in its water system improvement plans, if the PUC and its Staff claim this instant rate change application should not be granted to SUBURBAN.

**RESPONSE:**

Staff provides this response subject to and without waiving its previously filed objections.

Staff has not developed its position on this issue at this time. Staff will supplement this response after its direct testimony is filed to the extent responsive information is not contained in its pre-filed testimony.

Prepared by: Counsel  
Sponsor: Counsel



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**RFI 1-14.**

Please identify any and all persons and experts that the PUC has conferred with and/or used to review SUBURBAN's rate change application and to assist the OPUC is formulating discovery sent to SUBURBAN by the PUC.

**RESPONSE:**

Staff provides this response subject to and without waiving its previously filed objections.

In addition to Suburban, Staff has conferred with:

1. Christiaan Siaano, counsel for the Office of Public Utility Counsel

Current and former Staff personnel who have reviewed the application are:

1. Sam Chang, previous counsel for Staff
2. A. J. Smullen, counsel for Staff
3. Heidi Graham, Water Utilities Division
4. Leila Guerrero, Water Utilities Division
5. Patty Garcia, Water Utilities Division
6. Emily Sears, Water Utilities Division
7. Debi Loockerman, Water Utilities Division

Prepared by: Counsel  
Sponsor: Counsel

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**RFI 1-15**

Please identify any and all communications that the PUC and its Staff, including its attorneys, have had with any persons, any water and sewer utilities and districts of any kind and nature and their representatives, with any attorneys either individually or who represent persons or entities or agencies, with any state and local agencies, with any state or local elected officials, and with any other entities and persons that in any way mention, reference, relate to and pertain to this rate change application by SUBURBAN and any issues involved in this proceeding, and that in any way relate, refer and pertain to SUBURBAN and its affiliates during the past two (2) years.

**RESPONSE:**

Staff provides this response subject to and without waiving its previously filed objections.

In addition to material on the Commission's Interchange or otherwise already in the possession of Suburban, see Attachment A to these responses.

Prepared by: Counsel  
Sponsor: Counsel

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**RFP 1-1.**

Provide copies of all documents, tangible items and other demonstrative evidence to be used by the PUC at the final hearing in this case, trial.

**RESPONSE:**

Staff provides this response subject to and without waiving its previously filed objections.

Staff has not developed its position on this issue at this time. Staff notes that, pursuant to 16 Tex. Admin. Code § 22.225(a)(1)–(3), deposition testimony and responses to requests for information made by an opposing party that a party plans to introduce as part of its direct case or rebuttal case shall be filed at the time the party files its written direct testimony or written rebuttal testimony, respectively. A party is not required to prefile documents it intends to use during cross-examination.

Staff will supplement this response, if necessary, prior to the hearing in this matter to the extent responsive information is not contained in its pre-filed testimony.

Prepared by: Counsel  
Sponsor: Counsel

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**RFP 1-2**

Provide copies of all studies, reports, compilations, treatises, contracts, correspondence, photographs, graphs, diagrams, maps, charts, financial statements, invoices, bids, checks, governmental records, test results, audits, and other documents reviewed and relied upon by any witness for the PUC in this cause. In providing the response to this request, please provide the original Staff work papers in their original format, i.e. Excel spreadsheet, Word documents, etc. as they were reviewed by the PUC's Staff and its attorneys.

**RESPONSE:**

Staff provides this response subject to and without waiving its previously filed objections.

Staff has not identified which personnel, if any, will testify in this proceeding. Pursuant to the agreement of counsel, Staff will supplement this response, if necessary, after its direct testimony is filed to the extent responsive information is not contained in its pre-filed testimony.

Prepared by: Counsel  
Sponsor: Counsel

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**RFP 1-3**

Provide copies of all documents, studies, reports, compilations, computer programs (with associated data bases), charts, diagrams, maps, pictures, text books and other tangible materials reviewed by each testifying expert witness for the PUC used or relied upon by that expert witness in formulating any opinion to be offered at the final hearing by the PUC as expert witness testimony as well as was used by any such expert witness to support their testimony filed in this case. "Expert witness" shall be defined by Tex. R. Evid. 702 subject to the Texas Supreme Court's holding in *E. I. DuPont de Nemours and Co. v. Robinson*, 923 S. W. 2nd 549 (Tex. 1997) and the United States Supreme Court's holding in *Daubert v. Merrell Dow Pharmaceuticals, Inc.*, 509 U. S. 579, 113 S. Ct. 2786 (1993). With respect to each produced or identified items, please identify which expert witness reviewed the item and with which opinion of that expert witness the item is associated.

**RESPONSE:**

Staff provides this response subject to and without waiving its previously filed objections.

Staff has not identified which personnel, if any, will testify in this proceeding. Pursuant to the agreement of counsel, Staff will supplement this response, if necessary, after its direct testimony is filed to the extent responsive information is not contained in its pre-filed testimony.

Prepared by: Counsel  
Sponsor: Counsel

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**RFP 1-4**

Provide copies of all documents, studies, treatises, reports, compilations, computer programs (with associated data bases), charts, diagrams, maps, pictures, text books and other tangible materials reviewed by a non-testifying expert for the PUC used or relied upon by the PUC's expert witnesses in formulating any opinion to be offered at trial by the PUC and its Staff as expert witness testimony. "Expert witness" shall be defined by Tex. R. Evid. 702 subject to the Texas Supreme Court's holding in *E. I. DuPont de Nemours and Co. v. Robinson*, 923 S. W. 2nd 549 (Tex. 1997) and the United States Supreme Court's holding in *Daubert v. Merrell Dow Pharmaceuticals, Inc.*, 509, U. S. 579, 113 S. Ct. 2786 (1993). With respect to each produced or identified items, please identify which on-testifying expert reviewed the item and with which opinion of the OPUC's expert witness the item is associated.

**RESPONSE:**

Staff provides this response subject to and without waiving its previously filed objections.

Staff has not identified which personnel, if any, will testify in this proceeding. Pursuant to the agreement of counsel, Staff will supplement this response, if necessary, after its direct testimony is filed to the extent responsive information is not contained in its pre-filed testimony.

Prepared by: Counsel  
Sponsor: Counsel

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**RFP 1-5**

No RFI 1-5 propounded.

**RESPONSE:**

Prepared by:

Sponsor:

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**RFP 1-6**

Provide copies of all documentation in the possession or control of the PUC and its Staff that demonstrate that any cost, tax, assessment or expense in SUBURBAN's proposed water utility cost of service (or revenue requirement) rate application is not reasonable and necessary. With respect to each item produced, identify with specificity which cost or expense is being challenged and the expert witness that will sponsor that document and this opinion evidence at trial.

**RESPONSE:**

Staff provides this response subject to and without waiving its previously filed objections.

Staff has not developed its position on this issue at this time. As a result, Staff is unable to identify what documents, if any, demonstrate the information requested. Staff will supplement this response, if necessary, after its direct testimony is filed to the extent responsive information is not contained in its pre-filed testimony.

Prepared by: Counsel  
Sponsor: Counsel



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AND REQUEST FOR DISCLOSURE**

**RFP 1-7**

Provide copies of all documentation in the possession or control of the PUC and its Staff that demonstrate that any item or plant or investment in SUBURBAN's proposed water utility rate base (a/k/a invested capital) is not reasonably priced or includable for ratemaking purposes. With respect to each item produced, identify with specificity which individual item of plant or investment is being challenged and the expert witness that will sponsor that document and this opinion evidence at trial.

**RESPONSE:**

Staff provides this response subject to and without waiving its previously filed objections.

Staff has not developed its position on this issue at this time. As a result, Staff is unable to identify what documents, if any, demonstrate the information requested. Staff will supplement this response, if necessary, after its direct testimony is filed to the extent responsive information is not contained in its pre-filed testimony.

Prepared by: Counsel

\*Sponsor: Counsel

**SOAH DOCKET NO. 473-17-2457.WS  
PUC DOCKET NO. 46674**

<b>APPLICATION OF SUBURBAN UTILITY COMPANY, INC. FOR AUTHORITY TO CHANGE RATES</b>	§ § §	<b>BEFORE THE STATE OFFICE OF ADMINISTRATIVE HEARINGS</b>
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**COMMISSION STAFF'S RESPONSE  
TO SUBURBAN UTILITY COMPANY, INC. (SUBURBAN)  
FIRST REQUEST FOR INFORMATION,  
REQUEST FOR PRODUCTION,  
AND REQUEST FOR DISCLOSURE**

**RFP 1-8**

Provide copies of all documentation in the possession or control of the PUC and its Staff that demonstrate that any item of plant or investment in SUBURBAN's proposed water utility rate base is not used and useful for ratemaking purposes. With respect to each item produced, identify with specificity which individual item of plant or investment is being challenged and the expert witness that will sponsor that document and this opinion evidence at trial.

**RESPONSE:**

Staff provides this response subject to and without waiving its previously filed objections.

Staff has not developed its position on this issue at this time. As a result, Staff is unable to identify what documents, if any, demonstrate the information requested. Staff will supplement this response, if necessary, after its direct testimony is filed to the extent responsive information is not contained in its pre-filed testimony.

Prepared by: Counsel  
Sponsor: Counsel

**SOAH DOCKET NO. 473-17-2457.WS  
PUC DOCKET NO. 46674**

<b>APPLICATION OF SUBURBAN UTILITY COMPANY, INC. FOR AUTHORITY TO CHANGE RATES</b>	<b>§ § §</b>	<b>BEFORE THE STATE OFFICE OF ADMINISTRATIVE HEARINGS</b>
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**COMMISSION STAFF'S RESPONSE  
TO SUBURBAN UTILITY COMPANY, INC. (SUBURBAN)  
FIRST REQUEST FOR INFORMATION,  
REQUEST FOR PRODUCTION,  
AND REQUEST FOR DISCLOSURE**

**RFP 1-9**

Provide copies of all documentation in the possession or control of the PUC that demonstrate that any component of SUBURBAN's proposed capital structure is inappropriate for water utility ratemaking purposes in this docket. With respect to each item produced, identify with specificity which component is being challenged and the expert witness that will sponsor that document and this opinion evidence at trial.

**RESPONSE:**

Staff provides this response subject to and without waiving its previously filed objections.

Staff has not developed its position on this issue at this time. As a result, Staff is unable to identify what documents, if any, demonstrate the information requested. Staff will supplement this response, if necessary, after its direct testimony is filed to the extent responsive information is not contained in its pre-filed testimony.

Prepared by: Counsel  
Sponsor: Counsel

**SOAH DOCKET NO. 473-17-2457.WS  
PUC DOCKET NO. 46674**

<b>APPLICATION OF SUBURBAN UTILITY COMPANY, INC. FOR AUTHORITY TO CHANGE RATES</b>	§ § §	<b>BEFORE THE STATE OFFICE OF ADMINISTRATIVE HEARINGS</b>
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**COMMISSION STAFF'S RESPONSE  
TO SUBURBAN UTILITY COMPANY, INC. (SUBURBAN)  
FIRST REQUEST FOR INFORMATION,  
REQUEST FOR PRODUCTION,  
AND REQUEST FOR DISCLOSURE**

**RFP 1-10**

Provide copies of all documentation in the possession or control of the PUC and its Staff that demonstrate that any of SUBURBAN's proposed rate of return on any component of its capital structure is inappropriate for water utility ratemaking purposes in this docket. With respect to each item produced, identify with specificity which rate of return on which component is being challenged and the expert witness that will sponsor that document and this opinion evidence at trial.

**RESPONSE:**

Staff provides this response subject to and without waiving its previously filed objections.

Staff has not developed its position on this issue at this time. As a result, Staff is unable to identify what documents, if any, demonstrate the information requested. Staff will supplement this response, if necessary, after its direct testimony is filed to the extent responsive information is not contained in its pre-filed testimony.

Prepared by: Counsel  
Sponsor: Counsel

**SOAH DOCKET NO. 473-17-2457.WS  
PUC DOCKET NO. 46674**

<b>APPLICATION OF SUBURBAN UTILITY COMPANY, INC. FOR AUTHORITY TO CHANGE RATES</b>	<b>§ § §</b>	<b>BEFORE THE STATE OFFICE OF ADMINISTRATIVE HEARINGS</b>
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**COMMISSION STAFF'S RESPONSE  
TO SUBURBAN UTILITY COMPANY, INC. (SUBURBAN)  
FIRST REQUEST FOR INFORMATION,  
REQUEST FOR PRODUCTION,  
AND REQUEST FOR DISCLOSURE**

**RFP 1-11**

Provide copies of all documentation in the possession or control of the PUC and its Staff that demonstrate that any of SUBURBAN's proposed rate of return on any component of its capital structure is inappropriate for water utility ratemaking purposes in this docket. With respect to each item produced, identify with specificity which rate of return on which component is being challenged and the expert witness that will sponsor that document and this opinion evidence at trial.

**RESPONSE:**

Staff provides this response subject to and without waiving its previously filed objections.

Staff has not developed its position on this issue at this time. As a result, Staff is unable to identify what documents, if any, demonstrate the information requested. Staff will supplement this response, if necessary, after its direct testimony is filed to the extent responsive information is not contained in its pre-filed testimony.

Prepared by: Counsel  
Sponsor: Counsel

**SOAH DOCKET NO. 473-17-2457.WS  
PUC DOCKET NO. 46674**

<b>APPLICATION OF SUBURBAN UTILITY COMPANY, INC. FOR AUTHORITY TO CHANGE RATES</b>	<b>§ § §</b>	<b>BEFORE THE STATE OFFICE OF ADMINISTRATIVE HEARINGS</b>
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**COMMISSION STAFF'S RESPONSE  
TO SUBURBAN UTILITY COMPANY, INC. (SUBURBAN)  
FIRST REQUEST FOR INFORMATION,  
REQUEST FOR PRODUCTION,  
AND REQUEST FOR DISCLOSURE**

**RFP 1-12**

Provide copies of all documentation in the possession or control of the PUC and its Staff that demonstrate that any component of SUBURBAN's proposed rate design is inappropriate for water utility ratemaking purposes in this docket. With respect to each item produced, identify with specificity which rate design component is being challenged and the expert witness that will sponsor that document and this opinion evidence at trial.

**RESPONSE:**

Staff provides this response subject to and without waiving its previously filed objections.

Staff has not developed its position on this issue at this time. As a result, Staff is unable to identify what documents, if any, demonstrate the information requested. Staff will supplement this response, if necessary, after its direct testimony is filed to the extent responsive information is not contained in its pre-filed testimony.

Prepared by: Counsel  
Sponsor: Counsel

**SOAH DOCKET NO. 473-17-2457.WS  
PUC DOCKET NO. 46674**

**APPLICATION OF SUBURBAN                    §        BEFORE THE STATE OFFICE  
UTILITY COMPANY, INC. FOR                   §    OF  
AUTHORITY TO CHANGE RATES                   §        ADMINISTRATIVE HEARINGS**

**COMMISSION STAFF'S RESPONSE  
TO SUBURBAN UTILITY COMPANY, INC. (SUBURBAN)  
FIRST REQUEST FOR INFORMATION,  
REQUEST FOR PRODUCTION,  
AND REQUEST FOR DISCLOSURE**

**RFP 1-13**

No RFI 1-13 propounded.

**RESPONSE:**

Prepared by:  
Sponsor:

**SOAH DOCKET NO. 473-17-2457.WS  
PUC DOCKET NO. 46674**

<b>APPLICATION OF SUBURBAN UTILITY COMPANY, INC. FOR AUTHORITY TO CHANGE RATES</b>	§ § §	<b>BEFORE THE STATE OFFICE OF ADMINISTRATIVE HEARINGS</b>
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**COMMISSION STAFF'S RESPONSE  
TO SUBURBAN UTILITY COMPANY, INC. (SUBURBAN)  
FIRST REQUEST FOR INFORMATION,  
REQUEST FOR PRODUCTION,  
AND REQUEST FOR DISCLOSURE**

**RFP 1-14**

Provide copies of all documentation in the possession or control of the PUC and its Staff that demonstrate that any non-service fee or charge (water tariff) proposed by SUBURBAN is inappropriate. With respect to each item produced, identify with specificity which fee or charge is being challenged and the expert witness that will sponsor that document and this opinion evidence at trial.

**RESPONSE:**

Staff provides this response subject to and without waiving its previously filed objections.

Staff has not developed its position on this issue at this time. As a result, Staff is unable to identify what documents, if any, demonstrate the information requested. Staff will supplement this response, if necessary, after its direct testimony is filed to the extent responsive information is not contained in its pre-filed testimony.

Prepared by: Counsel  
Sponsor: Counsel



**SOAH DOCKET NO. 473-17-2457.WS  
PUC DOCKET NO. 46674**

<b>APPLICATION OF SUBURBAN UTILITY COMPANY, INC. FOR AUTHORITY TO CHANGE RATES</b>	<b>§ § §</b>	<b>BEFORE THE STATE OFFICE OF ADMINISTRATIVE HEARINGS</b>
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**COMMISSION STAFF'S RESPONSE  
TO SUBURBAN UTILITY COMPANY, INC. (SUBURBAN)  
FIRST REQUEST FOR INFORMATION,  
REQUEST FOR PRODUCTION,  
AND REQUEST FOR DISCLOSURE**

**RFP 1-15**

Provide copies of all documentation in the possession or control of the PUC and its Staff that demonstrate that any component, section or provision of SUBURBAN's proposed water utility tariff should not be approved in this docket. With respect to each item produced, identify with specificity which tariff component, section or provision is being challenged and the expert witness that will sponsor that document and this opinion evidence at trial.

**RESPONSE:**

Staff provides this response subject to and without waiving its previously filed objections.

Staff has not developed its position on this issue at this time. As a result, Staff is unable to identify what documents, if any, demonstrate the information requested. Staff will supplement this response, if necessary, after its direct testimony is filed to the extent responsive information is not contained in its pre-filed testimony.

Prepared by: Counsel  
Sponsor: Counsel

**SOAH DOCKET NO. 473-17-2457.WS  
PUC DOCKET NO. 46674**

<b>APPLICATION OF SUBURBAN UTILITY COMPANY, INC. FOR AUTHORITY TO CHANGE RATES</b>	§ § §	<b>BEFORE THE STATE OFFICE OF ADMINISTRATIVE HEARINGS</b>
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**COMMISSION STAFF'S RESPONSE  
TO SUBURBAN UTILITY COMPANY, INC. (SUBURBAN)  
FIRST REQUEST FOR INFORMATION,  
REQUEST FOR PRODUCTION,  
AND REQUEST FOR DISCLOSURE**

**RFP 1-16**

Provide copies of all documentation in the possession or control of the PUC and its Staff that indicate that the improvements to SUBURBAN's water utility plant which are in SUBURBAN' plans for improvement in this case are not necessary and needed, and identify how SUBURBAN can obtain the necessary funding to make the upgrades, improvements and repairs the TCEQ would have SUBURBAN make to bring its water system into conformance with TCEQ rules, and indicate how this would be accomplished.

**RESPONSE:**

Staff provides this response subject to and without waiving its previously filed objections.

Staff has not developed its position on this issue at this time. As a result, Staff is unable to identify what documents, if any, demonstrate the information requested. Staff will supplement this response, if necessary, after its direct testimony is filed to the extent responsive information is not contained in its pre-filed testimony.

Prepared by: Counsel  
Sponsor: Counsel

**SOAH DOCKET NO. 473-17-2457.WS  
PUC DOCKET NO. 46674**

<b>APPLICATION OF SUBURBAN UTILITY COMPANY, INC. FOR AUTHORITY TO CHANGE RATES</b>	<b>§ § §</b>	<b>BEFORE THE STATE OFFICE OF ADMINISTRATIVE HEARINGS</b>
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**COMMISSION STAFF'S RESPONSE  
TO SUBURBAN UTILITY COMPANY, INC. (SUBURBAN)  
FIRST REQUEST FOR INFORMATION,  
REQUEST FOR PRODUCTION,  
AND REQUEST FOR DISCLOSURE**

**RFP 1-17**

Provide copies of all documentation in the possession or control of the PUC and its Staff that indicate and show how the company can make improvements to SUBURBAN's water utility plant and facilities that the State of Texas would have the company bring it into conformance with TCEQ and PUC rules and with provisions of the Texas Water Code without the use of the instant rate increase and indicate how this would be accomplished.

**RESPONSE:**

Staff provides this response subject to and without waiving its previously filed objections..

Staff has not developed its position on this issue at this time. As a result, Staff is unable to identify what documents, if any, demonstrate the information requested. Staff will supplement this response, if necessary, after its direct testimony is filed to the extent responsive information is not contained in its pre-filed testimony.

Prepared by: Counsel  
Sponsor: Counsel

**SOAH DOCKET NO. 473-17-2457.WS  
PUC DOCKET NO. 46674**

<b>APPLICATION OF SUBURBAN UTILITY COMPANY, INC. FOR AUTHORITY TO CHANGE RATES</b>	<b>§ § §</b>	<b>BEFORE THE STATE OFFICE OF ADMINISTRATIVE HEARINGS</b>
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**COMMISSION STAFF'S RESPONSE  
TO SUBURBAN UTILITY COMPANY, INC. (SUBURBAN)  
FIRST REQUEST FOR INFORMATION,  
REQUEST FOR PRODUCTION,  
AND REQUEST FOR DISCLOSURE**

**RFP 1-18**

Provide copies of all documentation in the possession or control of the PUC and its Staff that demonstrate which rate case expenses incurred by SUBURBAN should be recoverable through rates. i.e., included in the revenue requirement or surcharged. With respect to each item produced, identify with specificity which expenses and the expert witness that will sponsor that document and this opinion evidence at trial.

**RESPONSE:**

Staff provides this response subject to and without waiving its previously filed objections.

Staff has not developed its position on this issue at this time. As a result, Staff is unable to identify what documents, if any, demonstrate the information requested. Staff will supplement this response, if necessary, after its direct testimony is filed to the extent responsive information is not contained in its pre-filed testimony.

Prepared by: Counsel  
Sponsor: Counsel

**SOAH DOCKET NO. 473-17-2457.WS  
PUC DOCKET NO. 46674**

**APPLICATION OF SUBURBAN                    §        BEFORE THE STATE OFFICE  
UTILITY COMPANY, INC. FOR               §                                OF  
AUTHORITY TO CHANGE RATES           §        ADMINISTRATIVE HEARINGS**

**COMMISSION STAFF'S RESPONSE  
TO SUBURBAN UTILITY COMPANY, INC. (SUBURBAN)  
FIRST REQUEST FOR INFORMATION,  
REQUEST FOR PRODUCTION,  
AND REQUEST FOR DISCLOSURE**

**RFP 1-19**

Provide copies of all documentation in the possession or control of the PUC and its Staff regarding any water utility cost of service allocations proposed by SUBURBAN that the PUC and its Staff claim are incorrect or otherwise inappropriate for ratemaking purposes in this docket. With respect to each item produced, identify with specificity each the challenged allocation and the expert witness that will sponsor that document and this opinion evidence at trial.

**RESPONSE:**

Staff provides this response subject to and without waiving its previously filed objections.

Staff has not developed its position on this issue at this time. As a result, Staff is unable to identify what documents, if any, demonstrate the information requested. Staff will supplement this response, if necessary, after its direct testimony is filed to the extent responsive information is not contained in its pre-filed testimony.

Prepared by: Counsel  
Sponsor: Counsel

**SOAH DOCKET NO. 473-17-2457.WS  
PUC DOCKET NO. 46674**

<b>APPLICATION OF SUBURBAN UTILITY COMPANY, INC. FOR AUTHORITY TO CHANGE RATES</b>	<b>§ § §</b>	<b>BEFORE THE STATE OFFICE OF ADMINISTRATIVE HEARINGS</b>
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**COMMISSION STAFF'S RESPONSE  
TO SUBURBAN UTILITY COMPANY, INC. (SUBURBAN)  
FIRST REQUEST FOR INFORMATION,  
REQUEST FOR PRODUCTION,  
AND REQUEST FOR DISCLOSURE**

**RFP 1-20**

Provide copies of all documentation in the possession or control of the PUC and its Staff that identify any water utility rate base allocations proposed by SUBURBAN that the PUC and its Staff believe are incorrect or otherwise inappropriate for ratemaking purposes in this docket. With respect to each item produced, identify with specificity the challenged allocation and the expert witness that will sponsor that document and this opinion evidence at trial.

**RESPONSE:**

Staff provides this response subject to and without waiving its previously filed objections.

Staff has not developed its position on this issue at this time. As a result, Staff is unable to identify what documents, if any, demonstrate the information requested. Staff will supplement this response, if necessary, after its direct testimony is filed to the extent responsive information is not contained in its pre-filed testimony.

Prepared by: Counsel  
Sponsor: Counsel

**SOAH DOCKET NO. 473-17-2457.WS  
PUC DOCKET NO. 46674**

<b>APPLICATION OF SUBURBAN UTILITY COMPANY, INC. FOR AUTHORITY TO CHANGE RATES</b>	<b>§ § §</b>	<b>BEFORE THE STATE OFFICE OF ADMINISTRATIVE HEARINGS</b>
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**COMMISSION STAFF'S RESPONSE  
TO SUBURBAN UTILITY COMPANY, INC. (SUBURBAN)  
FIRST REQUEST FOR INFORMATION,  
REQUEST FOR PRODUCTION,  
AND REQUEST FOR DISCLOSURE**

**RFP 1-21**

Provide copies any and all documents, materials or other items that the PUC claims that support any contention you may have that SUBURBAN cannot support the need for a customer rate surcharge to make necessary capital improvements to its water utility system as set forth into its rate change application.

**RESPONSE:**

Staff provides this response subject to and without waiving its previously filed objections.

Staff has not developed its position on this issue at this time. As a result, Staff is unable to identify what documents, if any, demonstrate the information requested. Staff will supplement this response, if necessary, after its direct testimony is filed to the extent responsive information is not contained in its pre-filed testimony.

Prepared by: Counsel  
Sponsor: Counsel

**SOAH DOCKET NO. 473-17-2457.WS  
PUC DOCKET NO. 46674**

<b>APPLICATION OF SUBURBAN UTILITY COMPANY, INC. FOR AUTHORITY TO CHANGE RATES</b>	<b>§ § §</b>	<b>BEFORE THE STATE OFFICE OF ADMINISTRATIVE HEARINGS</b>
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**COMMISSION STAFF'S RESPONSE  
TO SUBURBAN UTILITY COMPANY, INC. (SUBURBAN)  
FIRST REQUEST FOR INFORMATION,  
REQUEST FOR PRODUCTION,  
AND REQUEST FOR DISCLOSURE**

**RFP 1-22**

Please provide the original source documents used, and reviewed by any PUC witness to support their testimony filed in this case.

**RESPONSE:**

Staff provides this response subject to and without waiving its previously filed objections.

Staff has not identified which personnel, if any, will testify in this proceeding. Pursuant to the agreement of counsel, Staff will supplement this response, if necessary, after its direct testimony is filed to the extent responsive information is not contained in its pre-filed testimony.

Prepared by: Counsel  
Sponsor: Counsel



**SOAH DOCKET NO. 473-17-2457.WS  
PUC DOCKET NO. 46674**

**APPLICATION OF SUBURBAN § BEFORE THE STATE OFFICE  
UTILITY COMPANY, INC. FOR § OF  
AUTHORITY TO CHANGE RATES § ADMINISTRATIVE HEARINGS**

**COMMISSION STAFF'S RESPONSE  
TO SUBURBAN UTILITY COMPANY, INC. (SUBURBAN)  
FIRST REQUEST FOR INFORMATION,  
REQUEST FOR PRODUCTION,  
AND REQUEST FOR DISCLOSURE**

**RFP 1-23**

Please provide any and all documents that relate to the PUC's and its Staff's responses to the following numbered SUBURBAN Request for Information listed above; these documents to include, but not be limited to, any document, report, memoranda, email messages and any other written or electronic materials that the PUC and its Staff reviewed, used and/or know or presume that relate and/or were used to support or were reviewed in the process of the OPUC Staff attorney's testimony and/or stated positions as well as the PUC's and its Staff's responses to the Request for Information listed above.

**RESPONSE:**

Staff provides this response subject to and without waiving its previously filed objections.

In addition to material already in the possession of Suburban, see Staff's response to Suburban-Staff RFI 1-15.

Prepared by: Counsel  
Sponsor: Counsel

**SOAH DOCKET NO. 473-17-2457.WS  
PUC DOCKET NO. 46674**

**APPLICATION OF SUBURBAN  
UTILITY COMPANY, INC. FOR  
AUTHORITY TO CHANGE RATES**      §      **BEFORE THE STATE OFFICE  
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**COMMISSION STAFF'S RESPONSE  
TO SUBURBAN UTILITY COMPANY, INC. (SUBURBAN)  
FIRST REQUEST FOR INFORMATION,  
REQUEST FOR PRODUCTION,  
AND REQUEST FOR DISCLOSURE**

**RFP 1-24**

No RFP 1-24 propounded.

**RESPONSE:**

Prepared by:  
Sponsor:

**SOAH DOCKET NO. 473-17-2457.WS  
PUC DOCKET NO. 46674**

<b>APPLICATION OF SUBURBAN UTILITY COMPANY, INC. FOR AUTHORITY TO CHANGE RATES</b>	<b>§ § §</b>	<b>BEFORE THE STATE OFFICE OF ADMINISTRATIVE HEARINGS</b>
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**COMMISSION STAFF'S RESPONSE  
TO SUBURBAN UTILITY COMPANY, INC. (SUBURBAN)  
FIRST REQUEST FOR INFORMATION,  
REQUEST FOR PRODUCTION,  
AND REQUEST FOR DISCLOSURE**

**RFP 1-25**

Please provide copies of any and all correspondence, memoranda, letters, emails, documents, notes, messages, and any other materials received by and sent by the PUC and any of its Staff, including its attorneys, from, with and to any other persons, any water and sewer utilities and districts of any kind and nature, attorneys either individually or who represent persons or entities or agencies, any state and local agencies and departments, including, but not limited to, the Public Utility Commission of Texas and its staff, including attorneys, the Texas Commission on Environmental Quality and its staff, including attorneys, and any other state and local agencies and departments, any state or local elected officials, and any other entities and persons that in any way mention, reference, relate to and pertain to this rate change application by SUBURBAN and any issues involved in this proceeding, and that in any way relate, refer and pertain to SUBURBAN and its affiliates during the past three (3) years.

**RESPONSE:**

Staff provides this response subject to and without waiving its previously filed objections.

In addition to material on the Commission's Interchange or otherwise already in the possession of Suburban, see Staff's response to Suburban-Staff RFI 1-15.

Prepared by: Counsel  
Sponsor: Counsel

**SOAH DOCKET NO. 473-17-2457.WS  
PUC DOCKET NO. 46674**

<b>APPLICATION OF SUBURBAN UTILITY COMPANY, INC. FOR AUTHORITY TO CHANGE RATES</b>	<b>§ § §</b>	<b>BEFORE THE STATE OFFICE OF ADMINISTRATIVE HEARINGS</b>
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**COMMISSION STAFF'S RESPONSE  
TO SUBURBAN UTILITY COMPANY, INC. (SUBURBAN)  
FIRST REQUEST FOR INFORMATION,  
REQUEST FOR PRODUCTION,  
AND REQUEST FOR DISCLOSURE**

**RFD**

TRCP 194.2: Requests for Disclosures.

A party may request disclosure of any or all of the following:

- (a) the correct names of the parties to the lawsuit;
- (b) the name, address, and telephone number of any potential parties;
- (c) the legal theories and, in general, the factual bases of the responding party's claims or defenses (the responding party need not marshal all evidence that may be offered at trial);
- (e) the name, address, and telephone number of persons having knowledge of relevant facts, and a brief statement of each identified person's connection with the case;
- (f) for any testifying expert:
  - (1) the expert's name, address, and telephone number;
  - (2) the subject matter on which the expert will testify;
  - (3) the general substance of the expert's mental impressions and opinions and a brief summary of the basis for them, or if the expert is not retained by, employed by, or otherwise subject to the control of the responding party, documents reflecting such information;

**RESPONSE:**

Staff has not identified which personnel, if any, will testify in this proceeding. Pursuant to the agreement of counsel, Staff will supplement this response, if necessary, after its direct testimony is filed to the extent responsive information is not contained in its pre-filed testimony.

Prepared by: Counsel  
Sponsor: Counsel

**SOAH DOCKET NO. 473-17-2457.WS  
PUC DOCKET NO. 46674**

<b>APPLICATION OF SUBURBAN</b>	<b>§</b>	<b>BEFORE THE STATE OFFICE</b>
<b>UTILITY COMPANY, INC. FOR</b>	<b>§</b>	<b>OF</b>
<b>AUTHORITY TO CHANGE RATES</b>	<b>§</b>	<b>ADMINISTRATIVE HEARINGS</b>

**ATTACHMENT A  
TO COMMISSION STAFF'S RESPONSE  
TO SUBURBAN UTILITY COMPANY, INC. (SUBURBAN)  
FIRST REQUEST FOR INFORMATION,  
REQUEST FOR PRODUCTION,  
AND REQUEST FOR DISCLOSURE**

**Cox, Bernice**

---

**From:** Sears, Emily  
**Sent:** Friday, February 17, 2017 2:59 PM  
**To:** Smullen, AJ  
**Subject:** RE: Suburban Utility Company Discovery Requests

Andrew isn't on this case; but Patty García is.

*Emily Sears, CRRA  
Public Utility Commission of Texas  
Water Utility Regulation  
Financial Analyst  
512-936-7224  
Emily.Sears@puc.texas.gov*

---

**From:** Smullen, AJ  
**Sent:** Friday, February 17, 2017 12:26 PM  
**To:** Benter, Tammy <Tammy.Benter@puc.texas.gov>; Chang, Sam <Sam.Chang@puc.texas.gov>; Mack, Stephen <Stephen.Mack@puc.texas.gov>; Guerrero, Leila <Leila.Guerrero@puc.texas.gov>; Graham, Heidi <Heidi.Graham@puc.texas.gov>; Novak, Andrew <Andrew.Novak@puc.texas.gov>; Sears, Emily <Emily.Sears@puc.texas.gov>  
**Subject:** FW: Suburban Utility Company Discovery Requests

All,

Please see the attached RFIs from Suburban. In particular, please see request number 15 and request for production number 25, which ask for all communications that relate to the Suburban rate case or that relate to Suburban generally during the past 3 years.

I would appreciate if folks would begin identifying any responsive material they possess. In addition, please forward this email to any member of Staff who may possess responsive material. Finally, I remind all of our folks of their duty to preserve discoverable material. Please feel free to call me if you have any questions.

I will try to schedule a meeting soon to discuss these requests.

Best,

AJ

---

**From:** Les Romo [mailto:[lesromo.lawoffice@gmail.com](mailto:lesromo.lawoffice@gmail.com)]  
**Sent:** Friday, February 17, 2017 11:44 AM  
**To:** Smullen, AJ <AJ.Smullen@puc.texas.gov>  
**Subject:** Suburban Utility Company Discovery Requests

**WARNING: EXTERNAL SENDER.** Always be cautious when clicking links or opening attachments.  
**NEVER** provide your user ID or password.

Please find attached Suburban Utility Company's First Request for Information to the Public Utility Commission of Texas, and its First RFIs to the Office of Public Utility Counsel in the Suburban rate case.

--  
Law Office of Les Romo  
102 West Morrow Street, Suite 202  
P.O. Box 447  
Georgetown, Texas 78627  
(512) 868-5600; Fax: (512) 591-7815

This message and its attachments, if any, may contain confidential information which is legally privileged and intended for the recipient's eyes only. If you have received this message in error, please delete it and notify me immediately. You are further notified that unless you are the intended recipient of this message, any disclosure, copying, distribution or the taking of action in reliance upon the contents of this message or its attachments, if any, is strictly prohibited.

**Cox, Bernice**

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**From:** Guerrero, Leila  
**Sent:** Wednesday, February 15, 2017 10:06 AM  
**To:** Garcia, Patricia; Sears, Emily  
**Subject:** 46674 Suburban

Patty/Emily,

I am preparing a draft of RFI for the financials, please let me know if you want to add some questions. You may also send another set of RFIs for a separate Item #.

Thanks  
Leila



**Cox, Bernice**

---

**From:** Guerrero, Leila  
**Sent:** Tuesday, February 14, 2017 3:40 PM  
**To:** Loockerman, Debi  
**Cc:** Graham, Heidi  
**Subject:** 46674 RFI.Suburban.COMMISSION STAFF. RFIs  
**Attachments:** 46674 RFI.Suburban.COMMISSION STAFF. RFIs.docx

Hi Debi, I already have included your edits and I have additional 3 questions on page 4.

For your review/comments.

Thanks

Leila

COMMISSION STAFF'S  
SECOND REQUEST FOR INFORMATION TO SUBURBAN UTILITY COMPANY, INC.  
STAFF NO.2-1 THROUGH NO 2-\_\_

STAFF RFI      Please provide copies (hard copy and electronic file) of the general ledger for the test year (July 1, 2015 – June 30, 2016) and for the period including the known and measurable changes (July 1, 2016 – June 30, 2017, as the future months become available); and copies of the detailed chart of accounts with account codes and/or numbers, account names, and sub-accounts for Suburban Utility Company, Inc. ("Suburban").

STAFF RFI      For the years 2015 and 2016, please provide copies of the complete audited financial statements including auditor's reports and all notes for Suburban Utility Company, Inc., Consumers Water Inc., Community Utility, and MBC Water, including but not limited to balance sheets, profit and loss statements, and statements of cash flow. If audited financial statements are not available, provide the unaudited financial statements.

STAFF RFI      Please provide any additional internal or external audit reports produced since the beginning of 2015 regarding Suburban's water operations, if any. If audit reports are not available, please provide copies of any additional internal or external reports prepared by the management for Suburban's water operations.

STAFF RFI      Please provide the number of full time and part time employees that worked for the Suburban during the test year and for the period covering known and measurable changes (one year after the test year).

                 Please provide the number of personnel who provided services for compensation to Suburban on a contractual basis for the test year and one year after the test year.

STAFF RFI      Please provide a list of all employees of Suburban or any affiliate who received salaries, bonuses, allowances, benefits and other remuneration that were included in the cost of service either through direct billed or allocated contract expenses or salary expense. Please provide the following information:

- a) Name;
- b) Position and detailed job description;
- c) Date hired and date of termination, if applicable;
- d) Rate per month or per hour and/or annual salary; and

- e) Total number of hours and percentage of time worked per week for each affiliate including Suburban.

STAFF RFI Please provide the number of full time and/or part time employees of any affiliate, by company, who provided services for compensation paid by any affiliate for Suburban Utility Company, Consumers Water Inc., Community Utility, and MBC Water for 2015 and 2016.

STAFF RFI Please provide names of employees of any affiliate that work for Suburban and one or more of the affiliated companies. Provide name, position, and detailed job description, and total compensation allocated or direct billed to each affiliated company.

STAFF RFI Please provide copy of study, work papers, or research that show the salaries, allowances, medical insurance benefits, pension/retirement benefits, and other remuneration paid to employees of any affiliate are reasonable.

STAFF RFI NO Please provide schedule of all items, expenses, or cost of service that were allocated and/or direct billed to or from Suburban by any affiliated company.

STAFF RFI NO Please provide the percentage and amount allocated from the affiliated companies that were included in this rate change application.

STAFF RFI NO Please provide a copy of the cost allocation manual, study or basis of allocation of costs from the affiliated companies, if any.

STAFF RFI NO Please provide the allocation schedule of Consumers Water Inc., Community Utility, and MBC Water's cost of service/expenses allocated to affiliated companies for the test year, but not limited to Suburban. Provide breakdown of costs distributed to the affiliated companies.

STAFF RFI NO Please identify the accounting method (cash, accrual, or other) used to record income and expenses in accordance with GAAP and the NARUC.

STAFF RFI NO Please provide list of Suburban's employees covered by pension benefits; medical health insurance, other health or company benefits, if any.

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STAFF RFI NO. Please provide copies of invoices and other documents to support the following expenses claimed in the application:

- a) Purchased water
- b) Power expense-production only
- c) Other volume related expenses
- d) Materials
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- f) Management salaries
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- h) Professional services
- i) Regulatory expenses
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- k) Taxes other than income tax

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STAFF RFI NO Please provide a break-down or schedule of other revenues by subdivision including Castlewood Subdivision for the test year.

STAFF RFI NO Please provide the amount of regulatory assessment fees paid to the Texas Commission on Environmental Quality (TCEQ) for the calendar years 2014, 2015, and 2016. Please provide supporting documentation for the amounts paid.

STAFF RFI NO If Suburban made payments to affiliated companies thru inter-office transfers, credit or debit memos, please provide copies of the supporting documents, and/or journal entries to support the transfers or the due to / due from accounts.

STAFF RFI NO Please provide copies of IRS Form W-2 from all affiliates and/or Suburban to support salaries and wages included in the test year and IRS Form 1099-Misc for all affiliates to support contract labor or contract services expenses included in the test year.

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STAFF RFI NO      Please provide copies of a *combined* Organizational Structure for all the affiliates (Suburban, Consumers, Community, and MBC Water).

**Cox, Bernice**

---

**From:** Guerrero, Leila  
**Sent:** Wednesday, February 15, 2017 3:33 PM  
**To:** Chang, Sam  
**Cc:** Garcia, Patricia  
**Subject:** 46674 RFI.Suburban.COMMISSION STAFF. RFIs  
**Attachments:** 46674 RFI.Suburban.COMMISSION STAFF. RFIs.docx

Hi Sam,

Attached please find RFIs for Suburban for filing.

Please let me know if you have questions.

Thanks

Leila

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SECOND REQUEST FOR INFORMATION TO SUBURBAN UTILITY COMPANY, INC.  
STAFF NO.2-1 THROUGH NO 2-\_\_\_\_

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**Cox, Bernice**

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**From:** Guerrero, Leila  
**Sent:** Friday, January 13, 2017 12:11 PM  
**To:** Garcia, Patricia; Sears, Emily,  
**Cc:** Graham, Heidi; Loockerman, Debi  
**Subject:** 46674 Suburban

Hi Patty / Emily,

I will draft an admin review memo for Suburban. Please provide me your comments, if any, as soon as you have them so I can include in the memo, if needed.

Thanks,  
Leila

**Cox, Bernice**

---

**From:** Sears, Emily  
**Sent:** Monday, January 23, 2017 10:17 AM  
**To:** Garcia, Patricia  
**Subject:** 46674-Suburban - RFI  
**Attachments:** 46674-Suburban - RFI.DOCX

I added my one question.

## REQUEST FOR INFORMATION

**Docket No. 46674 – Suburban Utility Company, Inc.** *Application of Suburban Utility Company, Inc. for Rate/Tariff Change.*

For each of the water systems listed below, provide:

Beaumont Place – PWS ID: 1010098

Cypress Bend – PWS ID: 1010119

Reservoir Acres – PWS ID: 1010197

- 1) A copy of the most recent Comprehensive Compliance Investigation from the Texas Commission on Environmental Quality (TCEQ).
- 2) The construction approval letters from the TCEQ for the equipment installed after the previously approved rate case.

Please explain how the 10% return on equity request was determined.

**Cox, Bernice**

---

**From:** Garcia, Patricia  
**Sent:** Tuesday, February 07, 2017 9:02 AM  
**To:** Graham, Heidi  
**Subject:** Docket # 46674 - Suburban FW: Interchange Notification: 46674-281

Heidi,

Suburban refused to provide the CCIs because they state they are available to us through the TCEQ same as they are available to them. Should we file a motion to compel at this time?

Thanks,  
Patty

-----Original Message-----

**From:** NoReply  
**Sent:** Monday, February 06, 2017 4:31 PM  
**To:** Garcia, Patricia <Patricia.Garcia@puc.texas.gov>  
**Subject:** Interchange Notification: 46674-281

Filing Alert! A new document has been filed under 46674-281

Filing : 46674-281  
Item Type : RFI  
Date Filed : 2/6/2017  
Party : SUBURBAN UTILITY COMPANY, INC.  
Utility Type : W  
Category : D, REG, RATEWATER  
Date Sent : 2/6/2017  
User : PATRICIA GARCIA (pgarcia)

Document Link:

[http://interchange.puc.state.tx.us/WebApp/Interchange/application/dbapps/filings/pgSearch\\_Results.asp?TXT\\_CNTR\\_NO=46674&TXT\\_ITEM\\_NO=281](http://interchange.puc.state.tx.us/WebApp/Interchange/application/dbapps/filings/pgSearch_Results.asp?TXT_CNTR_NO=46674&TXT_ITEM_NO=281)

Master Description:

APPLICATION OF SUBURBAN UTILITY COMPANY, INC. FOR AUTHORITY TO CHANGE RATES

Filing Description:

Suburban Utility Company, Inc.'s Response to Commisoin Staff's First RFIs to

-----  
END OF FILING

Public Utility Commission  
[www.puc.texas.gov](http://www.puc.texas.gov)

Interchange  
interchange.puc.texas.gov

This is an automated message. Do not reply to this email address as account is does not accept emails If you have question, please contact the PUC Helpdesk at [helpdesk@puc.texas.gov](mailto:helpdesk@puc.texas.gov)

**Cox, Bernice**

---

**From:** Smullen, AJ  
**Sent:** Monday, February 27, 2017 9:42 AM  
**To:** Sears, Emily  
**Subject:** FW: 46674 - Staff's 2nd RFIs to Suburban  
**Attachments:** 46674 2nd RFI to Suburban (aj-bc).doc

AJ

---

**From:** Smullen, AJ  
**Sent:** Thursday, February 16, 2017 1:15 PM  
**To:** Les Romo <lesromo.lawoffice@gmail.com>  
**Cc:** Cox, Bernice <Bernice.Cox@puc.texas.gov>  
**Subject:** 46674 - Staff's 2nd RFIs to Suburban

Les,

Please find attached Staff's 2<sup>nd</sup> RFIs, which were filed today. Please feel free to let me know if you have any questions.

Best,

AJ Smullen  
Attorney, Legal Division  
Public Utility Commission of Texas  
(512) 936-7289



**SOAH DOCKET NO. 473-17-2457.WS  
PUC DOCKET NO. 46674**

<b>APPLICATION OF SUBURBAN UTILITY COMPANY, INC. FOR AUTHORITY TO CHANGE RATES</b>	§ § §	<b>BEFORE THE STATE OFFICE OF ADMINISTRATIVE HEARINGS</b>
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**COMMISSION STAFF'S SECOND REQUEST FOR INFORMATION  
TO SUBURBAN UTILITY COMPANY, INC. (SUBURBAN)  
QUESTION NOS. STAFF 2-1 THROUGH STAFF 2-27**

Pursuant to 16 Tex. Admin. Code Ann. § 22.144 (TAC), the Staff of the Public Utility Commission of Texas (Staff) requests that the Suburban Utility Company, Inc. (Suburban) 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: March 8, 2017

Respectfully Submitted,

**PUBLIC UTILITY COMMISSION OF TEXAS  
LEGAL DIVISION**

Margaret Uhlig Pemberton  
Division Director

Stephen Mack  
Managing Attorney

---

A. J. Smullen  
State Bar No. 24083881  
1701 N. Congress Avenue  
P.O. Box 13326  
Austin, Texas 78711-3326  
(512) 936-7289  
(512) 936-7268 (facsimile)  
AJ.Smullen@puc.texas.gov

**SOAH DOCKET NO. 473-17-2457.WS  
DOCKET NO. 46674**

**CERTIFICATE OF SERVICE**

I certify that a copy of this document will be served on all parties of record on March 8, 2017, in accordance with 16 TAC § 22.74.

---

A. J. Smullen

**SOAH DOCKET NO. 473-17-2457.WS  
PUC DOCKET NO. 46674**

**COMMISSION STAFF'S SECOND REQUEST FOR INFORMATION  
TO SUBURBAN UTILITY COMPANY, INC. (SUBURBAN)  
QUESTION NOS. STAFF 2-1 THROUGH STAFF 2-27**

**DEFINITIONS**

- A. "Suburban", "Company"; or "you" refers to the Suburban Utility Company, Inc. 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.

**SOAH DOCKET NO. 473-17-2457.WS  
PUC DOCKET NO. 46674**

**COMMISSION STAFF'S SECOND REQUEST FOR INFORMATION  
TO SUBURBAN UTILITY COMPANY, INC. (SUBURBAN)  
QUESTION NOS. STAFF 2-1 THROUGH STAFF 2-27**

**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.

**SOAH DOCKET NO. 473-17-2457.WS  
PUC DOCKET NO. 46674**

**COMMISSION STAFF'S SECOND REQUEST FOR INFORMATION  
TO SUBURBAN UTILITY COMPANY, INC. (SUBURBAN)  
QUESTION NOS. STAFF 2-1 THROUGH STAFF 2-27**

- STAFF 2-1 Please provide copies (hard copy and electronic file) of the general ledger for the test year (July 1, 2015 – June 30, 2016) and for the period including the known and measurable changes (July 1, 2016 – June 30, 2017, as the future months become available); and copies of the detailed chart of accounts with account codes and/or numbers, account names, and sub-accounts for Suburban Utility Company, Inc. (“Suburban”).
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STAFF 2-26

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**Cox, Bernice**

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- b) Position and detailed job description;
- c) Date hired and date of termination, if applicable;
- d) Rate per month or per hour and/or annual salary; and

- e) Total number of hours and percentage of time worked per week for each affiliate including Suburban.

STAFF RFI	Please provide the number of full time and/or part time employees of any affiliate, by company, who provided services for compensation paid by any affiliate for Suburban Utility Company, Consumers Water Inc., Community Utility, and MBC Water for 2015 and 2016.
STAFF RFI	Please provide names of employees of any affiliate that work for Suburban and one or more of the affiliated companies. Provide name, position, and detailed job description, and total compensation allocated or direct billed to each affiliated company.
STAFF RFI	Please provide copy of study, work papers, or research that show the salaries, allowances, medical insurance benefits, pension/retirement benefits, and other remuneration paid to employees of any affiliate are reasonable.
STAFF RFI NO	Please provide schedule of all items, expenses, or cost of service that were allocated and/or direct billed to or from Suburban by any affiliated company.
STAFF RFI NO	Please provide the percentage and amount allocated from the affiliated companies that were included in this rate change application.
STAFF RFI NO	Please provide a copy of the cost allocation manual, study or basis of allocation of costs from the affiliated companies, if any.
STAFF RFI NO	Please provide the allocation schedule of Consumers Water Inc., Community Utility, and MBC Water's cost of service/expenses allocated to affiliated companies for the test year, but not limited to Suburban. Provide breakdown of costs distributed to the affiliated companies.
STAFF RFI NO	Please identify the accounting method (cash, accrual, or other) used to record income and expenses in accordance with GAAP and the NARUC.
STAFF RFI NO	Please provide list of Suburban's employees covered by pension benefits, medical health insurance, and health or company benefits, if any.
STAFF RFI NO	Please provide copies of all contracts with its affiliates; if any, and any other contracts with other companies or service providers.

STAFF RFI NO Please provide copies, including written descriptions of the transactions represented by general journal entries made during the test year including any entries that created prior period adjustments as defined by GAAP.

STAFF RFI NO. Please provide copies of invoices and other documents to support the following expenses claimed in the application:

- a) Purchased water
- b) Power expense-production only
- c) Other volume related expenses
- d) Materials
- e) Contract work
- f) Management salaries
- g) Office supplies & expenses
- h) Professional services
- i) Regulatory expenses
- j) Miscellaneous expenses
- k) Taxes other than income tax

STAFF RFI NO Please provide copies of detailed invoices or other documents to support rate case expenses claimed in this application. The invoices should include all detailed invoices for expenses claimed such as travel, food, and lodging.

STAFF RFI NO Please provide a break-down or schedule of other revenues by subdivision including Castlewood Subdivision for the test year.

STAFF RFI NO Please provide the amount of regulatory assessment fees paid to the Texas Commission on Environmental Quality (TCEQ) for the calendar years 2014, 2015, and 2016. Please provide supporting documentation for the amounts paid.

STAFF RFI NO If Suburban made payments to affiliated companies through inter-office transfers, credit or debit memos, please provide copies of the supporting documents, and/or journal entries to support the transfers or the due to / due from accounts.

STAFF RFI NO Please provide copies of IRS Forms W-2 and W-3 from all affiliates and/or Suburban to support salaries and wages and any contractual charges that pay for affiliate salaries and wages included in the test year and IRS Form 1099-Misc for all affiliates to support contract labor or contract services expenses included in the test year.

STAFF RFI NO Please provide copies of income tax returns filed with the IRS for tax years 2014, 2015, and 2016 for Suburban and all affiliates.

STAFF RFI NO Please provide copies of *individual* Organizational Structure for Suburban and all affiliates.

STAFF RFI NO Please provide copies of a *combined* Organizational Structure for all the affiliates (Suburban, Consumers, Community, and MBC Water).

STAFF RFI NO Refer to the "System Totals Reports" filed in item # 238 in the docket in response to OPUC's first RFI and RFA. Please explain what "Number of Unread (Turned On) Meters" means.

**Cox, Bernice**

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**From:** Bond, Ryan  
**Sent:** Wednesday, January 25, 2017 8:56 AM  
**To:** Garcia, Patricia  
**Subject:** FW: Docket # 46674

Hi Patty,

How would you like me to respond to this customer?

Thank you,

Ryan

---

**From:** Gloria Gonzalez [mailto:go4glogonz@yahoo.com]  
**Sent:** Tuesday, January 24, 2017 3:33 PM  
**To:** Customer Service <customer@puc.texas.gov>  
**Cc:** Pat Hill <cajunbeat@sbcglobal.net>; Connie Esparza <esparzac1947@yahoo.com>; Steven. Adame Sr <mmsadame65@aol.com>  
**Subject:** Re: Docket # 46674

**WARNING: EXTERNAL SENDER. Always be cautious when clicking links or opening attachments. NEVER provide your user ID or password.**

Dear Customer Service,

I have made several calls regarding the appropriate information needed to insure a hearing for the ratepayers of my community and a neighboring community. Both have received a Notice of Proposed Water Rate Increase. The water company who services our neighborhoods provided a Protest form with the notice. The form they provided lists the P.U.C. docket #46674 in the heading and addresses item #2 of the listed requirements seen below referenced in your email response to my phone call of 1/20/17. Our combined ratepayers are to submit a minimum of 101 signatures to be granted a hearing.

At last glance the P.U.C. has received and recorded at least 171 such forms. Since the Protest forms were provided by the water company are they admissible under your rules?

Thank you for your assistance in this matter,  
Respectfully,  
Gloria Joy

---

**From:** Customer Service <customer@puc.texas.gov>  
**To:** "go4glogonz@yahoo.com" <go4glogonz@yahoo.com>  
**Sent:** Tuesday, January 24, 2017 2:45 PM  
**Subject:** FW: Docket # 46674

Ms. Joy:

Thank you for contacting the Public Utility Commission of Texas. Copied below you will find information on how to file a petition related to Docket #46674 consistent with Substantive Rule § 24.42.

Be sure to include the contents of the following rule on every page of the petition and file the original document(s) and 10 copies to our Central Records department at:

Public Utility Commission of Texas  
ATTN: Central Records  
1701 N. Congress Ave  
P.O. Box 13326  
Austin, TX 78711

**"§24.42. Contents of Petition Seeking Review of Rates Pursuant to the Texas Water Code, §13.043(b).**

(a) Petitions for review of rate actions filed pursuant to the TWC, §13.043(b), shall contain the original petition for review with the required signatures. Each signature page of a petition should contain in legible form the following information for each signatory ratepayer:

- (1) a clear and concise statement that the petition is an appeal of a specific rate action of the water or sewer service supplier in question as well as a concise description and date of that rate action;
- (2) the name, telephone number, and street or rural route address (post office box numbers are not sufficient) of each signatory ratepayer. The petition shall list the address of the location where service is received if it differs from the residential address of the signatory ratepayer;
- (3) the effective date of the decision being appealed;
- (4) the basis of the request for review of rates; and
- (5) any other information the commission may require.

(b) A petition must be received from a total of 10,000 or 10% of the ratepayers whose rates have been changed and who are eligible to appeal, whichever is less.

(c) A filing fee is not required for appeals or complaints filed under the TWC, §13.043(b)."

Feel free to contact us if you have additional questions.

Sincerely,

Customer Protection Division  
Public Utility Commission of Texas  
P.O. Box 13326  
Austin, TX 78711

**Cox, Bernice**

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**From:** Smullen, AJ  
**Sent:** Friday, February 17, 2017 3:00 PM  
**To:** Garcia, Patricia  
**Subject:** FW: Suburban Utility Company Discovery Requests  
**Attachments:** First RFIs to Public Utility Commission of Texas by Suburban Ut.pdf

Patty,

Please see the below. Please feel free to call me if you have any questions.

Best,

AJ

---

**From:** Smullen, AJ  
**Sent:** Friday, February 17, 2017 12:26 PM  
**To:** Benter, Tammy <Tammy.Benter@puc.texas.gov>; Chang, Sam <Sam.Chang@puc.texas.gov>; Mack, Stephen <Stephen.Mack@puc.texas.gov>; Guerrero, Leila <Leila.Guerrero@puc.texas.gov>; Graham, Heidi <Heidi.Graham@puc.texas.gov>; Novak, Andrew <Andrew.Novak@puc.texas.gov>; Sears, Emily <Emily.Sears@puc.texas.gov>  
**Subject:** FW: Suburban Utility Company Discovery Requests

All,

Please see the attached RFIs from Suburban. In particular, please see request number 15 and request for production number 25, which ask for all communications that relate to the Suburban rate case or that relate to Suburban generally during the past 3 years.

I would appreciate if folks would begin identifying any responsive material they possess. In addition, please forward this email to any member of Staff who may possess responsive material. Finally, I remind all of our folks of their duty to preserve discoverable material. Please feel free to call me if you have any questions.

I will try to schedule a meeting soon to discuss these requests.

Best,

AJ

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**From:** Les Romo [mailto:lesromo.lawoffice@gmail.com]  
**Sent:** Friday, February 17, 2017 11:44 AM  
**To:** Smullen, AJ <AJ.Smullen@puc.texas.gov>  
**Subject:** Suburban Utility Company Discovery Requests

**WARNING: EXTERNAL SENDER. Always be cautious when clicking links or opening attachments. NEVER provide your user ID or password.**



Please find attached Suburban Utility Company's First Request for Information to the Public Utility Commission of Texas, and its First RFIs to the Office of Public Utility Counsel in the Suburban rate case.

--  
Law Office of Les Romo  
102 West Morrow Street, Suite 202  
P.O. Box 447  
Georgetown, Texas 78627  
(512) 868-5600; Fax: (512) 591-7815

This message and its attachments, if any, may contain confidential information which is legally privileged and intended for the recipient's eyes only. If you have received this message in error, please delete it and notify me immediately. You are further notified that unless you are the intended recipient of this message, any disclosure, copying, distribution or the taking of action in reliance upon the contents of this message or its attachments, if any, is strictly prohibited.

**PUC DOCKET NO. 46674**

TO: The Public Utility Commission of Texas and its Staff, by and through A.J. Smullen, Staff Attorney and attorney of record, Public Utility Commission of Texas, 1701 North Congress Avenue, P.O. Box 13326, Austin, Texas 78711-3326

All definitions and instructions governing discovery in the Texas Rules of Civil Procedures, the procedural rules of the PUC and the procedural rules of the State Office of Administrative Hearings (SOAH) and the presiding Administrative Law Judge's orders shall apply to these Request for Information ("RFIs"). Unless written requests for clarification are received by the undersigned, it shall be presumed that all requests are fully and completely understood.

These questions are continuing in nature, and if there is any relevant change in circumstances, the PUC is to submit an amended and/or supplemented answer under oath to supplement each of its original answers to these questions. Please state the name of the witness(s) in this cause who will sponsor the answers to each question, and who can vouch for the truth of the answer.

Respectfully submitted this <sup>21</sup>7 day of February, 2017.

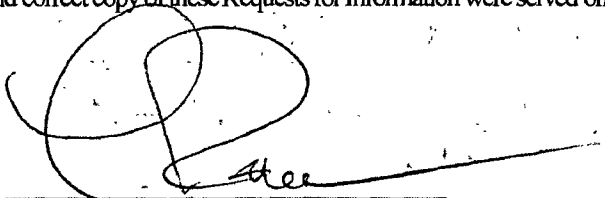


Les Romo  
State Bar No. 17225800  
Law Office of Les Romo  
102 West Morrow Street, Suite 202  
P.O. Box 447  
Georgetown, Texas 78627  
lesromo.lawoffice@gmail.com  
Tel. 512.868-55600; Fax 512.591-7815

ATTORNEY FOR SUBURBAN UTILITY COMPANY, INC.

**CERTIFICATE OF SERVICE**

I hereby certify that a true and correct copy of these Requests for Information were served on all required parties on this 7 day of February, 2017.



Les Romo

SUBURBAN'S FIRST  
REQUEST FOR INFORMATION TO THE PUC

I.  
DEFINITIONS

1. As used herein, the terms "you," "your," or "yourself," or "PUC" refer to and mean the Public Utility Commission of Texas, its officers, directors, managers, employees, its attorneys and legal staff, and its Legal Staff as well as its agents and those working in association with and/or who are affiliated with the OPUC, as well as its associates, affiliates, employees, agents, representatives and each person acting or purporting to act on behalf of the OPUC.

2. As used herein, the term "representative" means any and all agents, employees, servants, officers, directors, attorneys, or other persons acting or purporting to act on your behalf.

3. As used herein, the term "person" means any natural individual in any capacity whatsoever or any entity or organization, including divisions, departments and other units therein, and shall include, but not be limited to, a public or private corporation, partnership, joint venture, voluntary or unincorporated association, organization, proprietorship, trust, estate, governmental agency, commission, bureau, municipality or department.

4. As used herein, the term "document" means any medium upon which information can be recorded or retrieved; and includes, without limitation, the original and each copy, regardless of origin and location, of any book, pamphlet, periodical, letter, memorandum (including any memorandum or report of a meeting or conversation), invoice, bill, order form, receipt, financial statement, accounting entry, diary, calendar, telex, telegram, cable, facsimile transmission, report, record, contract, agreement, study, handwritten note, draft, working paper, chart, paper, print, laboratory record, drawing, sketch, graph, index, list, tape, photograph, microfilm, data sheet or data processing card, computer tape or disk, or any other written, recorded, transcribed, punched, taped, filmed or graphic matter, however produced or reproduced, which is in your possession, custody or control; or which has been, but is no longer, in your possession, custody, or control. The term "document" further means a copy of any document, as referred to above; if such copy contains notes, writings or is in any way different from or an alteration of the original document.

5. As used herein, the term "communication" means any oral or written utterance, notation or statement of any nature whatsoever, by and to whomsoever made, including, but not limited to, correspondence, conversations, dialogues, discussions, interviews, consultations, agreements and other understandings between or among two or more persons.

6. As used herein, the terms "identification," "identify," or "identity," when used in reference to: (a) a natural individual- require you to state his or her full name and residential and business address; (b) a corporation - require you to state its full corporate name and any names under which it does business, its state of incorporation, the address of its principal place of business, and the addresses of all of its offices; (c) a business - require you to state the full name or style under which the business is conducted, its business address or addresses, the types of businesses in which it is engaged, the geographic areas in which it conducts those business, and the identity of the person or persons who own, operate, and control the business; (d) a document - require you to state the number of pages and the nature of the document (e.g., letter or memorandum), its title, its date, the name or names of its authors and recipients, and its present location and custodian; (e) a communication - require you, if any part of the communication was written, to identify the document or documents which refer to or evidence the communication,

and, to the extent that the communication was non-written, to identify the persons participating in the communication and to state the date, manner, place and substance of the communication.

7. As used herein the term "water utility tariff" means the rate change application filed by SUBURBAN in this case, which is the basis of this action.

8. As used herein, the term "TCEQ" means the Texas Commission on Environmental Quality.

## **II.** **INSTRUCTIONS**

1. With respect to each request, in addition to supplying the information requested, you are to identify all documents that support, refer to or evidence the subject matter of each request and your answer thereto.

2. If any or all documents identified herein are no longer in your possession, custody or control because of destruction, loss or any other reason, then do the following with respect to each and every such document: (a) describe the nature of the document (e.g., letter or memorandum); (b) state the date of the document; (c) identify the persons who sent and received the original and a copy of the document; (d) state in as much detail as possible the contents of the document; and (e) state the manner and date of disposition of the document.

3. If you contend that any material or information responsive to any of the interrogatories is privileged, state in response that: (a) the information or material responsive to the interrogatories has been withheld; (b) the interrogatory to which the information or material relates; and (c) the privilege or privileges asserted.

4. Any answer stating the requested document or information will be provided only in prefiled testimony is insufficient and violates the discovery rules covering these proceedings. SUBURBAN is interested in learning what documents or information underlies and supports the opinions and facts the Opposing Party will be presenting at trial in its prefiled testimony. This information must be presented before prefiled testimony and supplemented up to the trial.

5. These request are to be considered continuing in nature and you are under a duty to timely supplement any response given to such requests as required by PUC and SOAH procedural rules and pursuant to Rule 193 of the Texas Rules of Civil Procedure.

## **III.** **REQUESTS FOR PRODUCTION**

**REQUEST NO. 1** Please indicate whether or not the water rate structure proposed in SUBURBAN's Rate/Tariff Change Application are appropriate. If not, what rate structure do you claim would be appropriate.

**REQUEST No. 2** Please indicate if SUBURBAN should be allowed to recover reasonable and necessary rate case expenses in addition to its cost of service requested. Does the PUC agree that reasonable and necessary rate case expense should be recovered in the form of a monthly surcharge charged to the customers in addition to any cost of service? If not, what form should be use to recover reasonable and necessary rate case expense.

**REQUEST NO. 3** Please identify if the PUC and its Staff is recommending disallowance of any expenses included in the cost of service, please provide the name and amount of each expense for which the OPUC and its Staff recommends a change and the specific reasons for disallowing any expense.

**REQUEST NO. 4** Please indicate what measures the PUC and its Staff have taken in their analysis to fix an overall level of revenue that will permit SUBURBAN a reasonable opportunity to earn a reasonable return on its invested capital used and useful in rendering service to the public over and above its reasonable and necessary operating expenses and will preserve the financial integrity of this utility as provided for in the Texas Water Code § 13.183.

**REQUEST NO. 5** If the percentage rate of return that the PUC and its Staff recommends is different from what appears in SUBURBAN's Rate/Tariff Change Application, please indicate the reasons for the difference and the amount of the difference.

**REQUEST NO. 6** If the net invested capital, or rate base, that the PUC and its staff recommends is different from what appears in SUBURBAN's Rate/Tariff Change Application, please indicate the reasons for the difference and the amount of the difference.

**REQUEST NO. 7** Please indicate any quality of service concerns the PUC and its Staff have with the water service provided by SUBURBAN. Please identify each specific concern by indicating exactly what is the concern, the exact location of the concern and the length of time the quality of service concern has been occurring.

**REQUEST NO. 8** If the PUC and its staff is recommending that SUBURBAN not be allowed to recover the revenue requirement to perform necessary operational and billing services, please explain how SUBURBAN will be able to provide continuous and adequate service to its customers, both current and future, if this recommendation is adopted by the SOAH ALJ and by the PUC.

**REQUEST NO. 9** Please provide the underlying rules, and provisions of the Texas Water Code, if any, as well as any other legal precedent, law or rule that you claim supports the use of data outside the test year and period of known and measurable change to determine the appropriate rate of return for an investor owned utility regulated by the PUC in the State of Texas if such claims are being made by the PUC or if the PUC plans to make such claims.

**REQUEST NO. 10** Please provide the underlying rules, and provisions of the Texas Water Code, if any, as well as any other legal precedent, law or rule that you claim supports any claim by the PUC that the proposed Capital Improvement Surcharge is not reasonable and necessary to provide facilities capable of providing adequate and continuous service by SUBURBAN to its customers.

**REQUEST NO. 11** Please explain in detail how SUBURBAN's capital structure is atypical of other regulated investor owned utilities in the State of Texas, and give specific examples to support this testimony if the PUC is making or plans to make such claim.

**REQUEST NO. 12** Please identify each component of SUBURBAN as set forth in its proposed plan of improvements, repairs and upgrades that the PUC claims is not necessary and/or needed in order for the company to provide continuous and adequate water service to its customers.

**REQUEST NO. 13** Provide the sources of funding that the PUC and its Staff claim are available to SUBURBAN in order for the company to pay for the water system improvements, upgrades and repairs as set forth in its water system improvement plans, if the PUC and its Staff claim this instant rate change application should not be granted to SUBURBAN.

**REQUEST NO. 14.** Please identify any and all persons and experts that the PUC has conferred with and/or used to review SUBURBAN's rate change application and to assist the OPUC in formulating discovery sent to SUBURBAN by the PUC.

**REQUEST No. 15** Please identify any and all communications that the PUC and its Staff, including its attorneys, have had with any persons, any water and sewer utilities and districts of any kind and nature and their representatives, with any attorneys either individually or who represent persons or entities or agencies, with any state and local agencies, with any state or local elected officials, and with any other entities and persons that in any way mention, reference, relate to and pertain to this rate change application by SUBURBAN and any issues involved in this proceeding, and that in any way relate, refer and pertain to SUBURBAN and its affiliates during the past two (2) years.

### **REQUEST FOR PRODUCTION**

**REQUEST FOR PRODUCTION NO. 1** Provide copies of all documents, tangible items and other demonstrative evidence to be used by the PUC at the final hearing in this case, trial.

**REQUEST FOR PRODUCTION NO. 2** Provide copies of all studies, reports, compilations, treatises, contracts, correspondence, photographs, graphs, diagrams, maps, charts, financial statements, invoices, bids, checks, governmental records, test results, audits, and other documents reviewed and relied upon by any witness for the PUC in this cause. In providing the response to this request, please provide the original Staff work papers in their original format, i.e. Excel spreadsheet, Word documents, etc as they were reviewed by the PUC's Staff and its attorneys

**REQUEST FOR PRODUCTION NO. 3** Provide copies of all documents, studies, reports, compilations, computer programs (with associated data bases), charts, diagrams, maps, pictures, text books and other tangible materials reviewed by each testifying expert witness for the PUC used or relied upon by that expert witness in formulating any opinion to be offered at the final hearing by the PUC as expert witness testimony as well as was used by any such expert witness to support their testimony filed in this case. "Expert witness" shall be defined by Tex. R. Evid. 702 subject to the Texas Supreme Court's holding in *E. I. DuPont de Nemours and Co. v. Robinson*, 923 S. W. 2nd 549 (Tex. 1997) and the United States Supreme Court's holding in *Daubert v. Merrell Dow Pharmaceuticals, Inc.*, 509, U. S. 579, 113 S. Ct. 2786 (1993). With respect to each produced or identified items, please identify which expert witness reviewed the item and with which opinion of that expert witness the item is associated.

**REQUEST FOR PRODUCTION NO. 4** Provide copies of all documents, studies, treatises, reports, compilations, computer programs (with associated data bases), charts, diagrams, maps, pictures, text books and other tangible materials reviewed by a non-testifying expert for the PUC used or relied upon by the PUC's expert witnesses in formulating any opinion to be offered at trial by the PUC and its Staff as expert witness testimony. "Expert witness" shall be defined by Tex. R. Evid. 702 subject to the Texas Supreme Court's holding in *E. I. DuPont de Nemours and Co. v. Robinson*, 923 S. W. 2nd 549 (Tex. 1997) and the United States Supreme Court's holding in *Daubert v. Merrell Dow Pharmaceuticals, Inc.*, 509, U. S. 579, 113 S. Ct. 2786 (1993). With respect to each produced or identified items, please identify which on-testifying expert reviewed the item and with which opinion of the OPUC's expert witness the item is associated.

**REQUEST FOR PRODUCTION NO. 6** Provide copies of all documentation in the possession or control of the PUC and its Staff that demonstrate that any cost, tax, assessment or expense in

SUBURBAN's proposed water utility cost of service (or revenue requirement) rate application is not reasonable and necessary. With respect to each item produced, identify with specificity which cost or expense is being challenged and the expert witness that will sponsor that document and this opinion evidence at trial.

**REQUEST FOR PRODUCTION NO. 7** Provide copies of all documentation in the possession or control of the PUC and its Staff that demonstrate that any item or plant or investment in SUBURBAN's proposed water utility rate base (a/k/a invested capital) is not reasonably priced or includable for ratemaking purposes. With respect to each item produced, identify with specificity which individual item of plant or investment is being challenged and the expert witness that will sponsor that document and this opinion evidence at trial.

**REQUEST FOR PRODUCTION NO. 8** Provide copies of all documentation in the possession or control of the PUC and its Staff that demonstrate that any item of plant or investment in SUBURBAN's proposed water utility rate base is not used and useful for ratemaking purposes. With respect to each item produced, identify with specificity which individual item of plant or investment is being challenged and the expert witness that will sponsor that document and this opinion evidence at trial.

**REQUEST FOR PRODUCTION NO. 9** Provide copies of all documentation in the possession or control of the PUC that demonstrate that any component of SUBURBAN's proposed capital structure is inappropriate for water utility ratemaking purposes in this docket. With respect to each item produced, identify with specificity which component is being challenged and the expert witness that will sponsor that document and this opinion evidence at trial.

**REQUEST FOR PRODUCTION NO. 10** Provide copies of all documentation in the possession or control of the PUC and its Staff that demonstrate that any of SUBURBAN's proposed rate of return on any component of its capital structure is inappropriate for water utility ratemaking purposes in this docket. With respect to each item produced, identify with specificity which rate of return on which component is being challenged and the expert witness that will sponsor that document and this opinion evidence at trial.

**REQUEST FOR PRODUCTION NO. 11** Provide copies of all documentation in the possession or control of the PUC and its Staff that demonstrate that any of SUBURBAN's proposed rate of return on any component of its capital structure is inappropriate for water utility ratemaking purposes in this docket. With respect to each item produced, identify with specificity which rate of return on which component is being challenged and the expert witness that will sponsor that document and this opinion evidence at trial.

**REQUEST FOR PRODUCTION NO. 12** Provide copies of all documentation in the possession or control of the PUC and its Staff that demonstrate that any component of SUBURBAN's proposed rate design is inappropriate for water utility ratemaking purposes in this docket. With respect to each item produced, identify with specificity which rate design component is being challenged and the expert witness that will sponsor that document and this opinion evidence at trial.

**REQUEST FOR PRODUCTION NO. 14** Provide copies of all documentation in the possession or control of the PUC and its Staff that demonstrate that any non-service fee or charge (water tariff) proposed by SUBURBAN is inappropriate. With respect to each item produced, identify with specificity which fee or charge is being challenged and the expert witness that will sponsor that



document and this opinion evidence at trial.

**REQUEST FOR PRODUCTION NO. 15** Provide copies of all documentation in the possession or control of the PUC and its Staff that demonstrate that any component, section or provision of SUBURBAN's proposed water utility tariff should not be approved in this docket. With respect to each item produced, identify with specificity which tariff component, section or provision is being challenged and the expert witness that will sponsor that document and this opinion evidence at trial.

**REQUEST FOR PRODUCTION NO. 16** Provide copies of all documentation in the possession or control of the PUC and its Staff that indicate that the improvements to SUBURBAN's water utility plant which are in SUBURBAN's plans for improvement in this case are not necessary and needed, and identify how SUBURBAN can obtain the necessary funding to make the upgrades, improvements and repairs the TCEQ would have SUBURBAN make to bring its water system into conformance with TCEQ rules, and indicate how this would be accomplished.

**REQUEST FOR PRODUCTION NO. 17** Provide copies of all documentation in the possession or control of the PUC and its Staff that indicate and show how the company can make improvements to SUBURBAN's water utility plant and facilities that the State of Texas would have the company bring it into conformance with TCEQ and PUC rules and with provisions of the Texas Water Code without the use of the instant rate increase and indicate how this would be accomplished.

**REQUEST FOR PRODUCTION NO. 18** Provide copies of all documentation in the possession or control of the PUC and its Staff that demonstrate which rate case expenses incurred by SUBURBAN should be recoverable through rates, i.e., included in the revenue requirement or surcharged. With respect to each item produced, identify with specificity which expenses and the expert witness that will sponsor that document and this opinion evidence at trial.

**REQUEST FOR PRODUCTION NO. 19** Provide copies of all documentation in the possession or control of the PUC and its Staff regarding any water utility cost of service allocations proposed by SUBURBAN that the PUC and its Staff claim are incorrect or otherwise inappropriate for ratemaking purposes in this docket. With respect to each item produced, identify with specificity each the challenged allocation and the expert witness that will sponsor that document and this opinion evidence at trial.

**REQUEST FOR PRODUCTION NO. 20** Provide copies of all documentation in the possession or control of the PUC and its Staff that identify any water utility rate base allocations proposed by SUBURBAN that the PUC and its Staff believe are incorrect or otherwise inappropriate for ratemaking purposes in this docket. With respect to each item produced, identify with specificity the challenged allocation and the expert witness that will sponsor that document and this opinion evidence at trial.

**REQUEST FOR PRODUCTION NO. 21** Provide copies any and all documents, materials or other items that the PUC claims that support any contention you may have that SUBURBAN cannot support the need for a customer rate surcharge to make necessary capital improvements to its water utility system as set forth into its rate change application.

**REQUEST FOR PRODUCTION NO. 22** Please provide the original source documents used, and reviewed by any PUC witness to support their testimony filed in this case.

**REQUEST FOR PRODUCTION NO 23** Please provide any and all documents that relate to

the PUC's and its Staff's responses to the following numbered SUBURBAN Request for Information listed above; these documents to include, but not be limited to, any document, report, memoranda, email messages and any other written or electronic materials that the PUC and its Staff reviewed, used and/or know or presume that relate and/or were used to support or were reviewed in the process of the OPUC Staff attorney's testimony and/or stated positions as well as the PUC's and its Staff's responses to the Request for Information listed above.

**REQUEST FOR PRODUCTION NO. 25.** Please provide copies of any and all correspondence, memoranda, letters, emails, documents, notes, messages, and any other materials received by and sent by the PUC and any of its Staff, including its attorneys, from, with and to any other persons, any water and sewer utilities and districts of any kind and nature, attorneys either individually or who represent persons or entities or agencies, any state and local agencies and departments, including, but not limited to, the Public Utility Commission of Texas and its staff, including attorneys, the Texas Commission on Environmental Quality and its staff, including attorneys, and any other state and local agencies and departments, any state or local elected officials, and any other entities and persons that in any way mention, reference, relate to and pertain to this rate change application by SUBURBAN and any issues involved in this proceeding, and that in any way relate, refer and pertain to SUBURBAN and its affiliates during the past three (3) years.

#### IV. REQUESTS FOR DISCLOSURE

Please disclose the information and material described in Tex. R. Civ. Proc. 194.2(a), (b), (c), (e), (f) and (i). [Copy of the applicable provisions of the rule are inserted below.]

##### TRCP 194.2. Requests for Disclosures.

A party may request disclosure of any or all of the following:

- (a) the correct names of the parties to the lawsuit;
- (b) the name, address, and telephone number of any potential parties;
- (c) the legal theories and, in general, the factual bases of the responding party's claims or defenses (the responding party need not marshal all evidence that may be offered at trial);
- (e) the name, address, and telephone number of persons having knowledge of relevant facts, and a brief statement of each identified person's connection with the case;
- (f) for any testifying expert:
  - (1) the expert's name, address, and telephone number;
  - (2) the subject matter on which the expert will testify;
  - (3) the general substance of the expert's mental impressions and opinions and a brief summary of the basis for them, or if the expert is not retained by, employed by, or otherwise subject to the control of the responding party, documents reflecting such information;

(4) if the expert is retained by, employed by, or otherwise subject to the control of the responding party:

(A) all documents, tangible things, reports, models, or data compilations that have been provided to, reviewed by, or prepared by or for the expert in anticipation of the expert's testimony; and

(B) the expert's current resume and bibliography;

(I) any witness statements described in Rule 192.3(h).

**Cox, Bernice**

---

**From:** Ray, Carolyn  
**Sent:** Friday, January 20, 2017 3:50 PM  
**To:** Garcia, Patricia  
**Subject:** Question regarding petition letter for Docket 46674

Ms. Gloria Joy

She is requesting additional information on how to submit petition letter.

(281)458-9762

[go4glogonz@yahoo.com](mailto:go4glogonz@yahoo.com)

Thank you.  
Carolyn

**Cox, Bernice**

---

**From:** Garcia, Patricia  
**Sent:** Wednesday, February 15, 2017 11:03 AM  
**To:** Guerrero, Leila; Sears, Emily  
**Subject:** RE: 46674 Suburban

Leila,

It's ready to go.

Thanks,  
Patty

---

**From:** Guerrero, Leila  
**Sent:** Wednesday, February 15, 2017 11:02 AM  
**To:** Garcia, Patricia ; Sears, Emily  
**Subject:** RE: 46674 Suburban

Patty,

Debi is just reviewing 3 items of my RFIs, all the other questions are ready to go. Does your RFI needs to be review by Heidi first? If it's ready, I will just include your question, please let me know.

Thanks  
Leila

---

**From:** Garcia, Patricia  
**Sent:** Wednesday, February 15, 2017 10:13 AM  
**To:** Guerrero, Leila <[Leila.Guerrero@puc.texas.gov](mailto:Leila.Guerrero@puc.texas.gov)>; Sears, Emily <[Emily.Sears@puc.texas.gov](mailto:Emily.Sears@puc.texas.gov)>  
**Subject:** RE: 46674 Suburban

Leila,

I do have one thing I need to ask. I had started this RFI and saved it at:

Q:\Water\RATE WORKPAPERS\46674 Suburban Utility Company, Inc

If you haven't started the RFI you can add to this one or just add my request to your RFI.

Thanks,  
Patty

---

**From:** Guerrero, Leila  
**Sent:** Wednesday, February 15, 2017 10:06 AM  
**To:** Garcia, Patricia <[Patricia.Garcia@puc.texas.gov](mailto:Patricia.Garcia@puc.texas.gov)>; Sears, Emily <[Emily.Sears@puc.texas.gov](mailto:Emily.Sears@puc.texas.gov)>  
**Subject:** 46674 Suburban

Patty/Emily,

I am preparing a draft of RFI for the financials, please let me know if you want to add some questions. You may also send another set of RFIs for a separate Item #.

Thanks  
Leila

**Cox, Bernice**

---

**From:** Guerrero, Leila  
**Sent:** Wednesday, February 15, 2017 11:02 AM  
**To:** García, Patricia; Sears, Emily  
**Subject:** RE: 46674 Suburban

Patty,

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Thanks  
Leila

---

**From:** Garcia, Patricia  
**Sent:** Wednesday, February 15, 2017 10:13 AM  
**To:** Guerrero, Leila <Leila.Guerrero@puc.texas.gov>; Sears, Emily <Emily.Sears@puc.texas.gov>  
**Subject:** RE: 46674 Suburban

Leila,

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Q:\Water\RATE WORKPAPERS\46674 Suburban Utility Company, Inc

If you haven't started the RFI you can add to this one or just add my request to your RFI.

Thanks,  
Patty

---

**From:** Guerrero, Leila  
**Sent:** Wednesday, February 15, 2017 10:06 AM  
**To:** Garcia, Patricia <Patricia.Garcia@puc.texas.gov>; Sears, Emily <Emily.Sears@puc.texas.gov>  
**Subject:** 46674 Suburban

Patty/Emily,

I am preparing a draft of RFI for the financials, please let me know if you want to add some questions. You may also send another set of RFIs for a separate Item #.

Thanks  
Leila

**Cox, Bernice**

---

**From:** Garcia, Patricia  
**Sent:** Wednesday, February 15, 2017 10:13 AM  
**To:** Guerrero, Leila; Sears, Emily  
**Subject:** RE: 46674 Suburban  
**Attachments:** 46674-Suburban - RFI # 2.docx

Leila,

I do have one thing I need to ask. I had started this RFI and saved it at:

Q:\Water\RATE WORKPAPERS\46674 Suburban Utility Company, Inc

If you haven't started the RFI you can add to this one or just add my request to your RFI.

Thanks,  
Patty

---

**From:** Guerrero, Leila  
**Sent:** Wednesday, February 15, 2017 10:06 AM  
**To:** Garcia, Patricia ; Sears, Emily  
**Subject:** 46674 Suburban

Patty/Emily,

I am preparing a draft of RFI for the financials, please let me know if you want to add some questions. You may also send another set of RFIs for a separate Item #.

Thanks  
Leila



**Cox, Bernice**

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**From:** Guerrero, Leila  
**Sent:** Wednesday, February 15, 2017 12:24 PM  
**To:** Garcia, Patricia; Sears, Emily  
**Subject:** RE: 46674 Suburban

Ok, thanks!

---

**From:** Garcia, Patricia  
**Sent:** Wednesday, February 15, 2017 11:03 AM  
**To:** Guerrero, Leila <Leila.Guerrero@puc.texas.gov>; Sears, Emily <Emily.Sears@puc.texas.gov>  
**Subject:** RE: 46674 Suburban

Leila,

It's ready to go.

Thanks,  
Patty

---

**From:** Guerrero, Leila  
**Sent:** Wednesday, February 15, 2017 11:02 AM  
**To:** Garcia, Patricia <Patricia.Garcia@puc.texas.gov>; Sears, Emily <Emily.Sears@puc.texas.gov>  
**Subject:** RE: 46674 Suburban

Patty,

Debi is just reviewing 3 items of my RFIs, all the other questions are ready to go. Does your RFI needs to be review by Heidi first? If it's ready, I will just include your question, please let me know.

Thanks  
Leila

---

**From:** Garcia, Patricia  
**Sent:** Wednesday, February 15, 2017 10:13 AM  
**To:** Guerrero, Leila <Leila.Guerrero@puc.texas.gov>; Sears, Emily <Emily.Sears@puc.texas.gov>  
**Subject:** RE: 46674 Suburban

Leila,

I do have one thing I need to ask. I had started this RFI and saved it at:

Q:\Water\RATE WORKPAPERS\46674 Suburban Utility Company, Inc

If you haven't started the RFI you can add to this one or just add my request to your RFI.

Thanks,  
Patty

---

**From:** Guerrero, Leila

**Sent:** Wednesday, February 15, 2017 10:06 AM

**To:** Garcia, Patricia <Patricia.Garcia@puc.texas.gov>; Sears, Emily <Emily.Sears@puc.texas.gov>

**Subject:** 46674 Suburban

Patty/Emily,

I am preparing a draft of RFI for the financials, please let me know if you want to add some questions. You may also send another set of RFIs for a separate Item #.

Thanks  
Leila

**Cox, Bernice**

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**From:** Guerrero, Leila  
**Sent:** Thursday, February 16, 2017 8:34 AM  
**To:** Smullen, AJ  
**Subject:** RE: 46674 RFI.Suburban.COMMISSION STAFF. RFIs

Looks good to me.

---

**From:** Smullen, AJ  
**Sent:** Thursday, February 16, 2017 8:23 AM  
**To:** Guerrero, Leila <Leila.Guerrero@puc.texas.gov>  
**Subject:** RE: 46674 RFI.Suburban.COMMISSION STAFF. RFIs

Leila,

I reworded the last question slightly. How does this look?

"Refer to the "System Totals Reports" filed as Attachment 1-27 in response to OPUC's first RFIs and RFAs. Please explain what "Number of Unread (Turned On) Meters" means."

Best,

AJ

---

**From:** Guerrero, Leila  
**Sent:** Wednesday, February 15, 2017 4:27 PM  
**To:** Smullen, AJ <AJ.Smullen@puc.texas.gov>  
**Cc:** Chang, Sam <Sam.Chang@puc.texas.gov>; Garcia, Patricia <Patricia.Garcia@puc.texas.gov>  
**Subject:** FW: 46674 RFI.Suburban.COMMISSION STAFF. RFIs

AJ,

Attached please find RFIs for Suburban. I sent it to Sam earlier.

Please let me know if you have questions.

Thanks  
Leila

---

**From:** Guerrero, Leila  
**Sent:** Wednesday, February 15, 2017 3:33 PM  
**To:** Chang, Sam <Sam.Chang@puc.texas.gov>  
**Cc:** Garcia, Patricia <Patricia.Garcia@puc.texas.gov>  
**Subject:** 46674 RFI.Suburban.COMMISSION STAFF. RFIs

Hi Sam,

Attached please find RFIs for Suburban for filing.

Please let me know if you have questions.

Thanks

Leila