



Control Number: 47275



Item Number: 341

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DOCKET NO. 47275

RECEIVED

RATEPAYERS' OF THE COMMONS  
WATER SUPPLY, INC. FOR  
AUTHORITY TO CHANGE RATES

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PUBLIC UTILITY COMMISSION  
OF TEXAS

2017 SEP 15 AM 9:59  
PUBLIC UTILITY COMMISSION  
FILING CLERK

**COMMISSION STAFF'S SECOND REQUEST FOR INFORMATION  
TO THE COMMONS WATER SUPPLY, INC. (COMMONS)  
QUESTION NOS. STAFF 2-1 THROUGH STAFF 2-6**

Pursuant to 16 Tex. Admin. Code Ann. § 22.144 (TAC), the Staff of the Public Utility Commission of Texas (Staff) requests that The Commons Water Supply, Inc. (Commons) 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 78712-3326.

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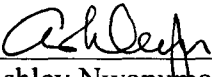
Dated: September 15, 2017

Respectfully Submitted,

**PUBLIC UTILITY COMMISSION OF TEXAS  
LEGAL DIVISION**

Margaret Uhlig Pemberton  
Division Director

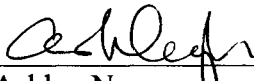
Katherine Lengieza Gross  
Managing Attorney

  
\_\_\_\_\_  
Ashley Nwonuma  
State Bar No. 24096650  
1701 N. Congress Avenue  
P.O. Box 13326  
Austin, Texas 78711-3326  
(512) 936-7163  
(512) 936-7268 (facsimile)  
ashley.nwonuma@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 on September 15, 2017 in accordance with 16 TAC § 22.74.

  
\_\_\_\_\_  
Ashley Nwonuma

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**COMMISSION STAFF'S SECOND REQUEST FOR INFORMATION  
TO THE COMMONS WATER SUPPLY, INC. (COMMONS)  
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**DEFINITIONS**

- A. "Commons," "the Company" or "you" refers to The Commons Water Supply, 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.

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**INSTRUCTIONS**

- 1) Pursuant to 16 TAC § 22.144(c)(2), Staff requests that answers to the requests for information be made under oath.
- 2) Please copy the question immediately above the answer to each question. State the name of the witness in this cause who will sponsor the answer to the question and can vouch for the truth of the answer.
- 3) These questions are continuing in nature, and if there is a relevant change in circumstances, submit an amended answer, under oath, as a supplement to your original answer.
- 4) Words used in the plural shall also be taken to mean and include the singular. Words used in the singular shall also be taken to mean and include the plural.
- 5) The present tense shall be construed to include the past tense, and the past tense shall be construed to include the present tense.
- 6) If any document is withheld under any claim of privilege, please furnish a list identifying each document for which a privilege is claimed, together with the following information: date, sender, recipients or copies, subject matter of the document, and the basis upon which such privilege is claimed.
- 7) Pursuant to 16 TAC § 22.144(g)(4), if the response to any request is voluminous, please provide a detailed index of the voluminous material.
- 8) Staff requests that each item of information be made available as it is completed, rather than upon completion of all information requested.

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- STAFF 2-1            The response to Staff's RFI No. 1 has illegible pages.  
Please provide a copy of the tiered billings for the gallonage for the months of January 2016 to August 2016. Only the months of September to December 2016 were provided.
- STAFF 2-2            For all months in the test year, please provide gallons billed for the following:  
5,001 – 10,000  
10,001 to 15,000  
15,001 to 20,000.
- STAFF 2-3            Reference schedule II-18. Please provide a narrative explanation for the increase in regulatory commission expense from \$3,242.00 in 2015 to \$17,774.00 in 2016. Please also provide invoices supporting the \$17,774.00 expense.
- STAFF 2-4            Reference schedule II-15. Please provide a narrative explanation for the increase in professional services from \$3,629.00 in 2015 to \$13,357.00 in 2016. Please also provide invoices and contracts as well as any other documentation that will justify the increase.
- STAFF 2-5            Reference schedule II-8. Please provide a narrative explanation for the increase in contract work from \$37,000.00 in 2015 to \$56,383.00 in 2016. Please also provide invoices and contracts as well as any other documentation that will justify the increase.
- STAFF 2-6            Please provide Cypress Gardens income tax statement for 2015 and 2016.