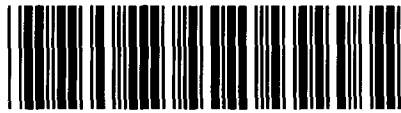


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SOAH DOCKET NO. 473-18-0193.WS
PUC DOCKET NO. 47275

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APPLICATION OF THE COMMONS § BEFORE THE STATE OFFICE
WATER SUPPLY, INC. FOR § OF
AUTHORITY TO CHANGE RATES § ADMINISTRATIVE HEARINGS

COMMISSION STAFF'S FIFTH REQUEST FOR INFORMATION TO
THE COMMONS WATER SUPPLY, INC.
QUESTION NOS. STAFF 5-1 THROUGH STAFF 5-9

Pursuant to 16 Texas Administrative Code § 22.144 (TAC), the Commission Staff (Staff) of the Public Utility Commission of Texas (Commission) requests that The Commons Water Supply, Inc. (The 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 78711-3326.

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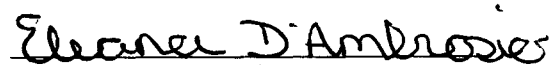
Dated: December 4, 2017

Respectfully Submitted,

**PUBLIC UTILITY COMMISSION OF TEXAS
LEGAL DIVISION**

Margaret Uhlig Pemberton
Division Director

Karen S. Hubbard
Managing Attorney




Eleanor D'Ambrosio
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CERTIFICATE OF SERVICE

I certify that a copy of this document will be served on all parties of record on December 4, 2017, in accordance with 16 TAC § 22.74.


Eleanor D'Ambrosio

**SOAH DOCKET NO. 473-18-0193.WS
PUC DOCKET NO. 47275**

**COMMISSION STAFF'S FIFTH REQUEST FOR INFORMATION TO
THE COMMONS WATER SUPPLY, INC.
QUESTION NOS. STAFF 5-1 THROUGH STAFF 5-9**

DEFINITIONS

- 1) "The 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.

- 2) "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 exist and these documents will be provided.

**SOAH DOCKET NO. 473-18-0193.WS
PUC DOCKET NO. 47275**

**COMMISSION STAFF'S FIFTH REQUEST FOR INFORMATION TO
THE COMMONS WATER SUPPLY, INC.
QUESTION NOS. STAFF 5-1 THROUGH STAFF 5-9**

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. 473-18-0193.WS
PUC DOCKET NO. 47275**

**COMMISSION STAFF'S FIFTH REQUEST FOR INFORMATION TO
THE COMMONS WATER SUPPLY, INC.
QUESTION NOS. STAFF 5-1 THROUGH STAFF 5-9**

- STAFF 5-1** Please provide a copy of the most current contract between The Commons and Gulf Utility Services. If this was not the contract in place during the test year, provide a copy of that contract as well.
- STAFF 5-2** Please provide a list of the specific duties related to the operations and maintenance of The Commons that are performed by Gulf Utility Services, including any services provided on an as-needed basis rather than as part of the contract requested in Staff 5-1.
- STAFF 5-3** Please provide a list of the specific duties related to the operations and maintenance of The Commons that are performed by any employee of The Signorelli Company grouped by employee.
- STAFF 5-4** Reference the supplemental response to Staff RFI No. 3-10. Please provide a written job description for the position titled "Development Management."
- STAFF 5-5** Admit or deny that The Signorelli Company primarily provides real estate development services. If denied, provide a full list of the services provided by the Signorelli Company.
- STAFF 5-6** Please admit or deny that The Commons is the only company that The Signorelli Company provides management oversight to. If the answer is deny, please list all other companies receiving management oversight from The Signorelli Company and a description of the business services or products provided by each company.
- STAFF 5-7** Please provide a full list of the companies owned by Signorelli Holdings, LTD and a description of the business services or products provided by each company.
- STAFF 5-8** Please provide balance sheets and income statements for the years 2015 and 2016 prepared for Signorelli Holdings, LTD. and each of the companies listed in the response to Staff RFI No. 5-7.
- STAFF 5-9** Please provide the tax returns filed by The Commons, or by the entity that included the operations of The Commons, for each year beginning in 2005 and ending in 2014 tax year.