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**APPLICATION OF COMMONS
WATER SUPPLY, INC. FOR
AUTHORITY TO CHANGE RATES**

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PUBLIC UTILITY COMMISSION

OF TEXAS

**COMMONS WATER SUPPLY, INC.'S FIRST SET OF REQUESTS FOR
INFORMATION TO STAFF**

TO: Public Utility Commission of Texas, by and through its attorney of record, Margaret Uhlig Pemberton, Karen S. Hubbard and Eleanor D'Ambrosio, 1701 N. Congress Avenue, P.O. Box 13326, Austin, Texas 78711-3326.

In connection with the Application filed by Commons Water Supply, Inc. for Authority to Change Rates, Commons Water Supply, Inc. ("Commons") requests that the Public Utility Commission of Texas ("Staff"), by and through its attorney of record, provide the following information within five (5) days of receipt of these requests. It is further requested that the answers to the requests for information be made under oath, and that each item of information be made available as it is completed, rather than upon compilation of all information requested. Each answer should identify the person responsible for preparing that answer (other than the purely clerical aspects of its preparation) and the name of the witness in this proceeding who will sponsor the answer and who can vouch for its accuracy. These requests are continuing in nature, and should there be a change in circumstances which would modify or change an answer supplied by you, such changed answer should be submitted immediately as a supplement to your original answer.

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Respectfully submitted,

COZEN O'CONNOR

By: *Tammy Shea*
Tammy Wavle Shea *by permission df*
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**ATTORNEYS FOR COMMONS WATER
SUPPLY, INC.**

CERTIFICATE OF SERVICE

I, Tammy Shea, certify that a copy of this document was served on all parties of record in this proceeding on December 21, 2017, by regular mail, facsimile transmission, e-mail or hand-delivery.

Tammy Shea
Tammy Wavle-Shea *by permission df*

DEFINITIONS AND EXPLANATORY NOTES

1. When the request calls for the identification of a "person or witness," the identification shall include a full name, business address and business telephone number. The identification should also include a job title and name of employer.
2. The terms "document" and "documents" are used in their broadest sense and shall mean and include all written, printed, typed, recorded, or graphic matter of every kind and description, including drafts, originals and copies, and all attachments and appendices thereto. Without limiting the foregoing, the terms "document" and "documents" shall include all agreements, contracts, communications, correspondence, letters, telegrams, telexes, messages, memoranda, records, reports, books, summaries, tape recordings or other records of telephone conversations or interviews, summaries or other records of personal conversations, minutes or summaries or other records of meetings and conferences, summaries or other records of negotiations, other summaries, diaries, diary entries, calendars, appointment books, time record, instructions, work assignments, forecasts, statistical data, statistical statements, financial statements, work sheets, work papers, drafts, graphs, maps, charts, tables, accounts, analytical records, consultants' reports, appraisals, bulletins, brochures, pamphlets, circulars, trade letters, press releases, notes, notices, marginal notations, notebooks, telephone records, bills, statements, records of obligation and expenditure, invoices, lists, journals, advertising, recommendations, printouts, compilations, tabulations, analysis, studies, surveys, transcripts of hearings, transcripts of testimony, affidavits, expense reports, microfilm, microfiche, articles, speeches, tape or disk recordings, sound recordings, video recordings, film, tape, photographs, punch cards, programs, data compilation from which information can be obtained, and other printed, written, handwritten, type-written, recorded, stenographic, computer-generated, computer-stored, or electronically-stored matter, however, and by whomever produced, prepared, reproduced, disseminated, or made. The terms "non-privileged document" and "non-privileged documents" also include all copies of documents by whatever means made, except that where a document is identified or produced, identical copies thereof which do not contain any markings, additions, or deletions different from the original need not be separately produced.
3. If any of the information requests is available in machine-readable form (such as paper or magnetic tapes, drums, disks or other storage), state the form in which it is available and describe the type of computer or other machinery required to read the information.
4. When a request calls for the identification of a "document," the identification should include the following:
 - a. the full name and address of the author(s) by whom the document was written, prepared, recorded or made;
 - b. the date of the document;
 - c. the title and/or "re" of the document;
 - d. the subject matter of the document;

- e. the full name and address of the recipient and every person who received copies of the document;
 - f. the full name and address of the person who has possession, custody or control of the document, or who is in charge of maintaining the document; and
 - g. if the document has been lost, shredded or destroyed (whether intentionally or unintentionally) an explanation of the reasons for and causes of such loss, shredding or destruction.
5. The term “studies” includes any document, as defined herein, which reflects or was utilized in the collection, evaluation, analysis, summarization or characterization of information in connection with the subjects referred to in this proceeding.
6. The term “Staff” or “Public Utility Commission of Texas” includes all of its agents, employees, parent companies, subsidiaries, affiliates, predecessors, successors, or assigns.

**COMMONS WATER SUPPLY, INC.'S
FIRST SET OF REQUESTS FOR THE
PUBLIC UTILITY COMMISSION STAFF**

- Applicant 1-1** Please provide all workpapers and calculations for which Mr. Charles used to make any changes in accumulated depreciation and net plant in the Depreciation Schedule provided in Exhibit L of the direct testimony of Mr. Fenner for the Applicant. Please provide an explanation clarifying the reason for each adjustment in the depreciation schedule.
- Applicant 1-2** Please provide all workpapers, calculations and documentation used and the state statute supporting the used by Mr. Charles in determining the billed monthly gallonage as proposed in his testimony.
- Applicant 1-3** Please provide all workpapers, calculations and documentation used and the state statute supporting the used by Mr. Charles in allocating portions of the revenue requirement to the higher gallonage rate tiers his testimony.
- Applicant 1-4** Please provide all workpapers, calculations and documentation used and the state statute supporting the used by Mr. Charles to derive the Staff's recommended rate design in Attachment GC-4 of his testimony.
- Applicant 1-5** Please provide all workpapers, calculations and documentation used and the state statute supporting each staff recommended adjustment made by Mr. Novak Table 1 of his testimony.
- Applicant 1-6** Please provide the state statute supporting the use of a barometer group in the determination of rate of return as used in Mr. Novak's testimony.
- Applicant 1-7** Please provide the justification and documentation supporting the similarity of each company used in the barometer group in Mr. Novak's testimony and The Commons Water Supply, Inc.
- Applicant 1-8** Please provide the state statute supporting the use of a hypothetical capital structure in Mr. Novak's testimony.

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