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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 RESPONSE TO THE COMMONS WATER
SUPPLY, INC.'S SECOND SET OF REQUESTS FOR INFORMATION TO STAFF
QUESTION NOS. APPLICANT 2-1 THROUGH APPLICANT 2-5**

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

DATED: February 21, 2018

Respectfully Submitted,

**PUBLIC UTILITY COMMISSION OF TEXAS
LEGAL DIVISION**

Margaret Uhlig Pemberton
Division Director

Karen Hubbard
Managing Attorney

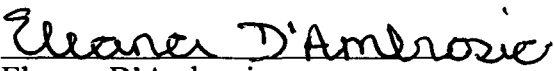


Eleanor D'Ambrosio
State Bar No. 24097559
1701 N. Congress Avenue
P.O. Box 13326
Austin, Texas 78711-3326
(512) 936-7295
(512) 936-7268 (facsimile)
Eleanor.Dambrosio@puc.texas.gov

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CERTIFICATE OF SERVICE

I certify that a copy of this document will be served on all parties of record on February 21, 2018, in accordance with 16 Texas Administrative Code § 22.74.


Eleanor D'Ambrosio

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APPLICANT 2-1 Please provide the depreciation analysis spreadsheet in its original format, which was produced in PDF format in response to Applicant 1-1.

RESPONSE: Please see Staff's Supplemental Response to Applicant 1-1, which includes a corrected version of the depreciation schedule filed in response to Applicant 1-1. The spreadsheet originally produced in response to Applicant 1-1 was filed in Excel format at the time Staff's responses were filed and is publicly available on the PUC Interchange: Item No. 402, Document Name 47275_402_965628 (filed December 29, 2017).

Prepared by: Greg Charles and Counsel
Sponsor: Greg Charles

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APPLICANT 2-2 Please provide the information regarding the stock price (P_0) used in your DCF valuation model (P_0) and how you came to your number.

RESPONSE: Please see pages 11 through 18 of Staff's response to Applicant 1-7. These pages contain stock information from Barron's investment service and include both the name of the company and "Barron's" in the heading at the top of the page. For example, the heading on page 11 reads, "AWR Stock Price & News - American States Water Co. - Barron's." The current price of the stock (P_0) for each company included in the barometer group is the price labeled as "previous close."

Prepared by: Andrew Novak and Counsel
Sponsor: Andrew Novak

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APPLICANT 2-3 State the name, address, and telephone number of persons having knowledge of relevant facts, and a brief statement of each identified person's connection with this matter.

RESPONSE: **All Staff are located on the 7th or 8th floor of the William B. Travis Building at 1701 North Congress Ave., Austin, TX 78701**

**Eleanor D'Ambrosio, (512) 936-7295
Ms. D'Ambrosio is the attorney assigned to this case.**

**Karen Hubbard, (512) 936-7277
Ms. Hubbard is the managing attorney overseeing this case.**

**Greg Charles, (512) 936-7014
Mr. Charles is the engineering specialist assigned to this case.**

**Heidi Graham, (512) 936-7139
Ms. Graham is the Director of Engineering overseeing this case.**

**Andrew Novak, (512) 936-7016
Mr. Novak is the financial analyst assigned to this case.**

**Debi Loockerman, (512) 936-7384
Ms. Loockerman is the Director of Water Rates Analysis overseeing this case.**

Prepared by: Counsel
Sponsor: Counsel

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- APPLICANT 2-4** For any testifying expert who has not been disclosed, state:
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 a brief summary of the basis for them, or if the expert is not retained by, employed by, or otherwise subject to your control, documents reflecting such information;
 4. if the expert is retained by, employed by, or otherwise subject to your control:
 - a. produce 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. produce the expert's current resume and bibliography.

RESPONSE: **All of Staff's testifying experts have been disclosed.**

Prepared by: Counsel
Sponsor: Counsel

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APPLICANT 2-5 State the legal theories and, in general, the factual bases of your claims or defenses.

RESPONSE: Please see the Direct Testimony of Andrew Novak and the Direct Testimony of Greg Charles.

Prepared by: Counsel
Sponsor: Counsel