



Control Number: 47626



Item Number: 183

Addendum StartPage: 0

SOAH DOCKET NO. 473-18-1253.WS RECEIVED
DOCKET NO. 47626

APPLICATION OF SOUTHWEST
LIQUIDS, INC. FOR AUTHORITY
TO CHANGE RATES

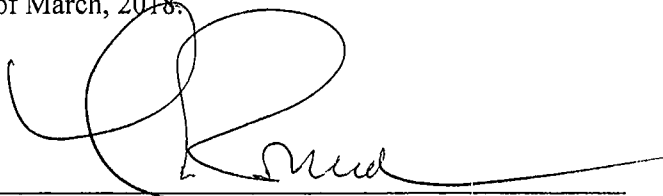
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2018 MAR 22 AM 11:59
BEFORE THE STATE OFFICE
PUBLIC UTILITY COMMISSION
HEARING CLERK
ADMINISTRATIVE HEARINGS

**SOUTHWEST LIQUIDS, INC.'S RESPONSES TO COMMISSION STAFF'S
SECOND REQUEST FOR INFORMATION TO SOUTHWEST LIQUIDS, INC.
QUESTIONS NOS. STAFF 2-1 THROUGH STAFF 2-6**

Pursuant to Chapter 16, et. seq. of the Texas Administrative Code, §22.144 ("TAC"), and Rules 190-198 of the Texas Rules of Civil Procedure, SOUTHWEST LIQUIDS, INC. ("SOUTHWEST") hereby submits and serves these responses to the Commission Staff's Second Request for Information to Southwest Liquids, Inc. Questions Nos. Staff 2-1 through Staff 2-6. SOUTHWEST will supplement its responses should it become aware of any additional responsive information.

Respectfully submitted this 22nd day of March, 2018.



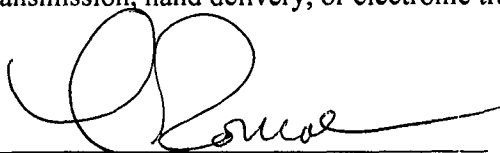
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ATTORNEY FOR SOUTHWEST LIQUIDS, INC.

CERTIFICATE OF SERVICE

I hereby certify that a true and correct copy of the foregoing Response to Commission Staff's Second RFIs to Southwest Liquids, Inc. was served on the attached Service List on the 22nd day of March,

2018 by either First Class Mail, Facsimile Transmission, hand delivery, or electronic transmission.



Les Romo

**SOUTHWEST LIQUIDS, INC.'S RESPONSES
TO PUC STAFF'S SECOND REQUEST FOR INFORMATION**

GENERAL OBJECTIONS:

(1) SOUTHWEST objects to providing any documents, materials or any other item or matter that are in the possession and/or control of the Public Utility Commission of Texas, its staff, their attorneys and/or by any state or other agency to which they have equal access as SOUTHWEST.

(2) SOUTHWEST objects to any request that either requests or requires it to create documents, lists, charts or other materials that are not currently in existence and/or which are not in its possession or which are equally accessible to the Public Utility Commission of Texas, its staff, their attorneys and/or by any state or other agency to which they have equal access as SOUTHWEST.

(3) SOUTHWEST objects to any request that requests documents, materials and information that is beyond the scope of the issues in this case, and which are not subject to the company's control or possession.

(4) SOUTHWEST objects to any request that requests documents, materials and information that are not relevant to the issues in this case and/or which will not lead to the discovery of relevant information.

(5) SOUTHWEST objects to any request that seeks information, documents and materials that cover the time period that is beyond the test year in this case, and that is beyond the period of known and measurable changes in this proceeding.

The General Objections apply to each and every Response by SOUTHWEST to the PUC Staff's First Request for Information as if set forth fully within each Response.

CONDITIONS TO RESPONSE:

1. SOUTHWEST's responses are based on the present knowledge of its directors, managers and officers, after a reasonable investigation and a reasonable interpretation and construction of the request in providing these responses.

2. SOUTHWEST reserves the right to redact any portion(s) of otherwise responsive and non-privileged documents that contain irrelevant, non-responsive or privileged information.

3. SOUTHWEST will supplement its responses if, and when such may be required by applicable discovery rules to this case, if necessary.

4. Any responses that SOUTHWEST will produce documents and/or materials are limited in scope to the degree that the documents and/or materials exist, and are in the possession and/or control of SOUTHWEST and/or reasonably available to SOUTHWEST.

Without waiving these objections, and subject to the afore-said objections and conditions, SOUTHWEST responds to the PUC Staff's Second Request for Information as follows:

Staff 2-1 Please provide invoices and receipts supporting the \$15,420 expense for purchased power.

RESPONSE: Please see Exhibit B to the Prefiled Testimony of Bret W. Fenner, P.C. on file in this case.

Staff 2-2 Please provide invoices and receipts supporting the \$1,503 expense for Other Volume Related expenses.

RESPONSE: Please see Exhibit C to the Prefiled Testimony of Bret W. Fenner, P.C. on file in this case.

Staff 2-3 Please provide invoices, employment contracts, pay stubs, time sheets, W-2 forms, W-3 forms or any other documentation supporting the \$51,025 expense for Employee Labor.

RESPONSE The expense for employee labor was deleted from this case as the employee in question is no longer employed and this cost was omitted from the Prefiled Testimony of Bret W. Fenner, P.C. on file in this case.

Staff 2-4 Please provide invoices, employment contracts, pay stubs, time sheets, tax records or any other documentation supporting the \$4,142 expense for Employee Pensions & Benefits Expense.

RESPONSE Please see the response to Staff 2-3 above, reiterated herein.

Staff 2-5 Please provide invoices and policies which specify coverage supporting the \$15,173 expense for Insurance Expense.

RESPONSE: Please see the response to Staff 2-3 above, reiterated herein.

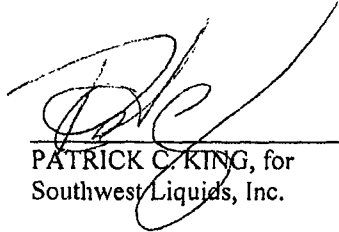
Staff 2-6 Please provide invoices and receipts supporting the \$1,847 expense for Miscellaneous Expenses.

RESPONSE: Please see Exhibit J to the Prefiled Testimony of Bret W. Fenner, P.C. on file in this case.

STATE OF TEXAS
COUNTY OF HAYS

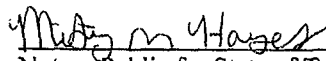
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The above-stated responses are true and correct to the best of my knowledge.



PATRICK C. KING, for
Southwest Liquids, Inc.

SWORN TO AND SUBSCRIBED BEFORE ME, by Patrick C. King , on this 30 day of March,
2018.



Notary Public for State of Texas



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PUC DOCKET NO. 47626**

SERVICE LIST

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