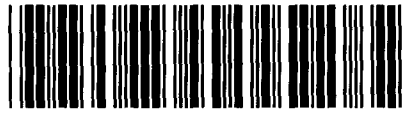


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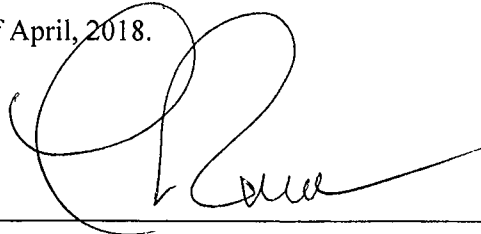
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APPLICATION OF SOUTHWEST LIQUIDS, INC. FOR AUTHORITY TO CHANGES RATES § BEFORE THE STATE OFFICE OF PUBLIC UTILITY COMMISSION ADMINISTRATIVE HEARINGS § FILING CLERK

SOUTHWEST LIQUIDS, INC.'S SUPPLEMENTAL AND AMENDED RESPONSES TO LA VENTANA RANCH OWNERS ASSOCIATION'S FIRST REQUEST FOR INFORMATION TO SOUTHWEST LIQUIDS, INC.

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 Supplemental and Amended responses to the LA VENTANA RANCH OWNERS ASSOCIATION's ("LA VENTANA") First Request for Information to Southwest Liquids, Inc. SOUTHWEST will supplement its responses should it become aware of any additional responsive information.

Respectfully submitted this 21st day of April, 2018.



Les Romo
Law Offices of Les Romo
102 West Morrow Street, Suite 202
P.O. Box 447
Georgetown, Texas 78627
(512) 868-5600
Fax: (512) 591-7815
State Bar No. 17225800
lesromo.lawoffice@gmail.com

ATTORNEY FOR SOUTHWEST LIQUIDS, INC.

CERTIFICATE OF SERVICE

I hereby certify that a true and correct copy of the foregoing Supplemental and Amended Response to La Ventana Ranch Owner's Association's First RFIs to Southwest Liquids, Inc. was served on the

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attached Service List on the 24th day of April, 2018 by either First Class Mail, Facsimile Transmission, hand delivery, or electronic transmission.

Les Romo

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**SOUTHWEST LIQUIDS, INC.'S SUPPLEMENTAL AND AMENDED RESPONSES
TO LA VENTANA RANCH OWNERS ASSOCIATION'S FIRST REQUEST FOR
INFORMATION TO SOUTHWEST LIQUIDS, INC.**

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 LA VENTANA, its officers, directors, employees, agents, their attorneys and/or by any other entity 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 LA VENTANA, its officers, directors, employees, agents, their attorneys and/or by any other entity 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 Supplemental and Amended Response by SOUTHWEST to LA VENTANA'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 supplements and amends its responses to the following LA VENTANA's First Request for Information to SOUTHWEST as follows:

LVROA NO. 1-6 State the full names of the individual(s) at PGMS who provide(s) contract management services to SWL. Provide titles, job descriptions, resumes, employment contracts, and W-2 forms.

RESPONSE: The individuals who provide such services that are employed by PGMS are:

Timothy Young, general management services.
Sharon Livingston, regulatory compliance manager
Jennifer Rossi; controller and bookkeeping.
Patrick C. King, oversight and management

There are no resumes to provide. There are no employment contracts. As for the W-2 forms, these documents contain private confidential information, and these belong to the employees of PGMS, and these employees have not given their permission for these documents to be provided to anyone. SOUTHWEST is seeking a protective order regarding these documents.

LVROA NO. 1-7 Provide all contracts for services between PGMS and its other customer utilities in Texas, and any standard price sheet used by PGMS to price its services.

RESPONSE: OBJECTION: SOUTHWEST objects to this request as it is overly broad and unduly burdensome. SOUTHWEST further objects to this request, because it asks for information and documents that are not relevant to this proceeding nor will they lead to relevant discoverable information and documents. SOUTHWEST further objects to this request, because it asks for information that is proprietary in nature, and SOUTHWEST cannot unilaterally release information that is owned by and/or which is confidential to PGMS and its customers. Without waving these objections, SOUTHWEST is being charged the same amount for the services that are provided by PGMS the same rates that PGMS charges its other customers for the same and/or similar services. SOUTHWEST is seeking a protective order regarding these documents. Previously provided to all parties in SOUTHWEST LIQUIDS' Response to Commission Staff's RFI 3-1 to which copies of PGMS' service contract with Interim-La Ventana, LLC and with SOUTHWEST LIQUIDS were provided. It should be noted that the terms of the contracts are the same, and the charges by PGMS are the same, except that there is an increase in the charges to SOUTHWEST due to the provision in the contract with this company, PGMS is permitted to make an increased adjustment on an annual bases based on any increase in the Consumer Price Index.

LVROA NO. 1-8 Provide a listing of all affiliates of PGMS, including identification of ownership of each entity.

RESPONSE: As the term “affiliate” is defined by Commission rules, and by the Texas Water Code, the only affiliate that PGMS has is SOUTHWEST. SOUTHWEST’s stock is owned by Zachary King.

LVROA NO. 1-13 Regarding the prefiled testimony of Bret Wayne Fenner, Exhibit H, Page 307, Invoice No. 1016-1046, time entry dated 2/1/2016, “Revise financials showing Pat used own funds for purchase,” provide the financials (balance sheet and income statement) prior to this entry, provide all general ledger entries made referenced on 1/1/2016 of this invoice, and describe why these entries were made.

RESPONSE: To the degree that SOUTHWEST has any responsive documents, see its response to Commission Staff’s First RFIs to SOUTHWEST, RFIs, 1-1, 1-5, 1-6 and 1-11. Also, the invoice should be dated February 1, 2017, and the ledger information is contained in SOUTHWEST’s Response to Commission Staff RFI 1-6. The entry was made to have this information in the ledger and accounts. This was contributed equity not a loan.

LVROA NO. 1-19 Provide a detailed general ledger activity showing all transactions leading to the balance sheet provided in response to Staff RFI 1-1.

RESPONSE: See SOUTHWEST’s Response to Commission Staff’s RFI 1-6 in which the subject Ledger and information was provided.

LVROA NO. 1-20 Identify the nature of the liability indicated in the PGMS Balance Sheet provided in Southwest Liquids’ response to Staff RFI 1-1 as “Accounts Payable” in the amount of \$136,726.53. Provide a list of all individuals and/or entities and the amount owed to each pertaining to this liability.

RESPONSE: See the attached A/P QuickZoom for SOUTHWEST.

LVROA NO. 1-21 Identify the nature of the liability in the PGMS Balance Sheet provided in Southwest Liquids’ response to Staff RFI 1-1 as “Loan from PGMS, Inc.” in the amount of \$30,398.39. Provide all invoices, contracts, proposals, and documents pertaining to this liability.

RESPONSE: See the attached Transaction by Account for SOUTHWEST.

LVROA NO. 1-22 Identify the nature of the current asset indicated in the PGMS Balance Sheet provided in Southwest Liquids’ AMENDED response to Staff RFI 1-2 as “Due from Southwest Liquids, Inc.” in the amount of \$__, and provide all general ledger entries associated with this amount.

RESPONSE: See the Response to LVROA NO. 1-21 above.

LVROA NO. 1-23 Identify the nature of the current asset indicated in PGMS Balance Sheet provided in Southwest Liquids' AMENDED response to Staff RFI 1-2 as "Shareholder Loan" in the amount of \$____, and provide all general ledger entries associated with this account.

RESPONSE: See the attached A/R Aging QuickZoom for SOUTHWEST.

LVROA NO. 1-24 Provide all notes or other documentation regarding the "Shareholder Loan" in the amount of \$____, shown as a current asset in the PGMS Balance Sheet provided in Southwest Liquids' AMENDED response to Staff RFI 1-2.

RESPONSE: There are no responsive documents.

LVROA NO. 1-25 Describe PGMS's involvement with regard to all construction of facilities, lines, or other infrastructure at the La Ventana water system after March 2007.


RESPONSE: PGMS was not involved in the construction of facilities, lines or other infrastructure at or for the La Ventana water system.

The witness for all of the above-listed responses is: Patrick C. King.

STATE OF TEXAS
COUNTY OF HAYS

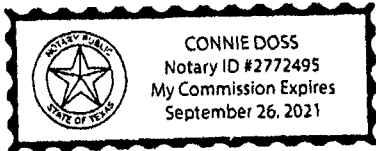
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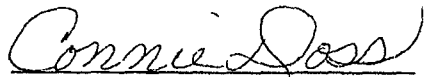
The above-stated responses are true and correct to the best of my knowledge.



PATRICK C. KING, for
Southwest Liquids, Inc.

SWORN TO AND SUBSCRIBED BEFORE ME, by Patrick C. King , on this 24th day of
April, 2018.





Notary Public for State of Texas

**SOAH DOCKET NO. 473-18-1253.WS
PUC DOCKET NO. 47626**

SERVICE LIST

ADMINISTRATIVE LAW JUDGES:

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Wendy K. L. Harvel
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512-475-4993 Fax: 512-475-4994

PUBLIC UTILITY COMMISSION OF TEXAS

Rosemary Hambright, Staff Attorney
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512-936-7230; Fax: 512-936-7268
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LA VENTANA RANCH OWNERS ASSOCIATION, INC. - INTERVENOR

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GEORGE HANSEN - INTERVENOR

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(512) 757-7232
ghansen2@gmail.com

LVR0A 1-20

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Southwest Liquids, Inc.
A/P Aging QuickZoom
As of December 31, 2016

Type	Date	Num	Due Date	Aging	Open Balance
PGMS, Inc.					
Bill	12/03/2014	075-083	12/13/2014	749	2,955.78
Bill	03/06/2015	075-085	03/16/2015	656	9,709.85
Bill	03/16/2015	075-006	03/26/2015	646	4,229.57
Bill	04/17/2015	075-007	04/27/2015	614	4,982.56
Bill	05/14/2015	075-008	05/24/2015	587	5,487.48
Bill	06/10/2015	075-009	06/20/2015	560	4,487.53
Bill	07/15/2015	075-010	07/25/2015	525	6,750.78
Bill	08/12/2015	075-011	08/22/2015	497	4,596.58
Bill	09/15/2015	075-012	09/25/2015	463	6,411.50
Bill	10/14/2015	075-013	10/24/2015	434	5,274.80
Bill	11/17/2015	075-014	11/27/2015	400	4,756.46
Bill	12/08/2015	075-015	12/18/2015	379	4,757.16
Bill	01/06/2016	075-016	01/16/2016	350	4,641.04
Bill	02/09/2016	075-017	02/19/2016	316	4,620.43
Bill	03/08/2016	075-018	03/18/2016	288	4,986.66
Bill	04/12/2016	075-019	04/22/2016	253	4,854.13
Bill	05/24/2016	075-020	06/03/2016	211	5,836.98
Bill	06/13/2016	075-0021	06/23/2016	191	8,814.78
Bill	07/14/2016	075-022	07/24/2016	160	5,865.29
Bill	08/12/2016	075-023	08/22/2016	131	5,864.04
Bill	09/09/2016	075-024	09/19/2016	103	5,377.38
Bill	10/21/2016	075-025	10/31/2016	61	5,706.98
Bill	11/11/2016	075-026	11/21/2016	40	4,851.63
Bill	12/07/2016	075-027	12/17/2016	14	4,844.36
Bill	12/31/2016	075-028	12/31/2016		6,062.78
Total PGMS, Inc.					136,726.53
TOTAL					136,726.53

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 Accrual Basis

Southwest Liquids, Inc.
Transactions by Account
 As of December 31, 2017

Type	Date	Num	Name	Memo	Clr	Split	Debit	Credit	Balance
Loan from PGMS, Inc.									0.00
Transfer	08/14/2015			Funds Transfer		General Operati...		1,390.78	1,390.78
Check	09/30/2015	1070	PGMS, Inc.	VOID:		General Operati...	0.00		1,390.78
General Journal	12/31/2015	7		Health Insuran...		Payroll Liabilities		14,383.25	15,774.03
General Journal	12/31/2015	8		Health Insuran...		Payroll Liabilities		4,559.60	20,333.63
Check	09/01/2016	1132	PGMS, Inc.			General Operati...	5,000.00		15,333.63
General Journal	12/31/2016	24		Transfer to Lo...		Payroll Liabilities		15,064.76	30,398.39
Total Loan from PGMS, Inc.							5,000.00	35,398.39	30,398.39
TOTAL							5,000.00	35,398.39	30,398.39

LVRDA 1-21

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PROFESSIONAL GENERAL MANAGEMENT SERVICES, INC.
A/R Aging QuickZoom
As of April 23, 2018

LVROA 1-23

Type	Date	Num	Name	Due Date	Class	Aging	Open Balance
Patrick King							
Check	05/28/2014	15401	Patrick King				35,000.00
Check	06/24/2014	Cashiers	Patrick King				70,000.00
Total Patrick King							105,000.00
TOTAL							<u>105,000.00</u>