

Control Number: 47897



Item Number: 189

Addendum StartPage: 0

SOAH DOCKET NO. 473-18-3008.WS
PUC DOCKET NO. 47897

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APPLICATION OF FOREST GLEN § BEFORE THE STATE OFFICE
UTILITY COMPANY FOR § OF COMMISSION
AUTHORITY TO CHANGE RATES § ADMINISTRATIVE HEARINGS

COMMISSION STAFF'S THIRD REQUEST FOR INFORMATION
TO FOREST GLEN UTILITY COMPANY (FGUC)
QUESTION NOS. STAFF 3-1 THROUGH 3-11

Pursuant to 16 Tex. Admin. Code Ann. § 22.144 (TAC), the Staff of the Public Utility Commission of Texas (Staff) requests that Forest Glen Utility Company (FGUC) 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 78712-3326.

Dated: June 21, 2018

Respectfully Submitted,

**PUBLIC UTILITY COMMISSION OF TEXAS
LEGAL DIVISION**

Margaret Uhlig Pemberton
Division Director

Katherine Lengieza Gross
Managing Attorney

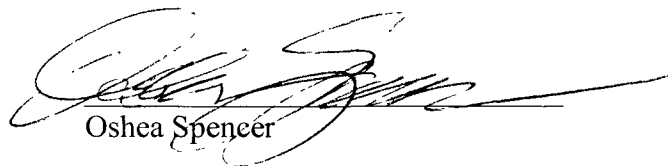


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CERTIFICATE OF SERVICE

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



Oshea Spencer

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**COMMISSION STAFF'S THIRD REQUEST FOR INFORMATION
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DEFINITIONS

- A. "FGUC," "the Company" or "you" refers to the Forest Glen Utility Company and any person acting or purporting to act on their behalf, including without limitation, attorneys, agents, advisors, investigators, representatives, employees or other persons.

- B. "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.

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TO FOREST GLEN UTILITY COMPANY (FGUC)
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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(h)(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.

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**COMMISSION STAFF'S THIRD REQUEST FOR INFORMATION
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QUESTION NOS. STAFF 3-1 THROUGH 3-11**

Staff 3-1 Please explain how expenses and revenues are separated by Class (WWTP or Reuse) and entered into the accounting system as described in Staff 2-5.

Staff 3-2 Please provide the calculations to determine the ratios to allocate expenses for reuse and sewer as described in Staff 2-5.

Staff 3-3 Please provide the financial records and statements containing the amounts supporting the calculations in Staff 3-2.

Staff 3-4 Please provide a reconciliation in electronic format (excel) of the GL account balances provide in response to Staff RFI 2-23 to Forest Glens Application Schedule I-1.

Staff 3-5 Please provide a copy of the invoices supporting the transactions below:

	2017	Type	Date	Num	Adj	Name	Memo	Split	Debit
Regulatory Expenses									
TCEQ		Check	01/11/2017	616		TCEQ	Revenue and Regul Lone Star-7012461		531 71
		Check	11/08/2017	747		TCEQ	Revenue and Regul Lone Star-7012461		1,250 00
	2016								
Other Plant Maintenance		Bill	09/16/2016	062788		USA Blue Book	Filters/avacodo floz Accounts Payable		1,191 71

Staff 3-6 Please provide a copy of all detailed invoices the Forest Glen Utility Company is claiming for rate case expense. Detail should include hourly rates, number of hours billed, name of the person performing the tasks, detailed description of the tasks, and invoices supporting any expenses charged through.

Staff 3-7 Please provide documentation indicating the amounts billed to wastewater for contract work and management services are only for wastewater services and the amounts billed to reuse contract work and management services are for reuse services only. Please include documentation indicating the actual wastewater and reuse service performed and time billed for each of the expense amounts.

Staff 3-8 Please provide the depreciation schedule and calculations for the depreciation expense amount \$6,740 on Schedule I-1 row 25.

Staff 3-9 Does the proposed revenue requirement include treatment costs for reuse?

Staff 3-10 How do you determine the percentage of allocation between reuse and wastewater? What is the percentage of allocation and their basis?

Staff 3-11 Admit or deny that the wastewater treatment plant was originally designed for reuse.

Note: For any confidential information please follow the instructions for filing confidential documents when you file these items. Additionally, please see our website for filing rules and procedures: <http://www.puc.texas.gov/industry/filings/FilingProceed.aspx>