

Control Number: 48640



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APPLICATION OF W.E. VLASEK FOR  
AUTHORITY TO CHANGES RATES

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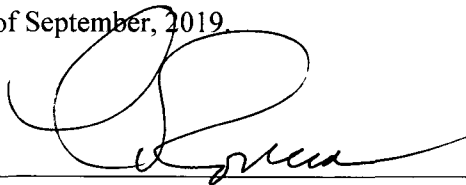
BEFORE THE STATE OFFICE  
OF  
ADMINISTRATIVE HEARINGS

STATE OFFICE  
FILING CLERK

**W.E. VLASEK'S RESPONSE TO COMMISSION STAFF'S FIFTH  
REQUEST FOR INFORMATION TO W.E. VLASEK  
QUESTION NO. STAFF 5-1**

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, W.E. VLASEK hereby submits and serves this response to the Commission Staff's Fifth Request for Information to W.E. VLASEK, Question No. Staff 5-1. W.E. VLASEK will supplement his responses should he become aware of any additional responsive information. W.E. VLASEK stipulates that the following response to the Staff's Second Request for Information may be treated by all parties as if the answer was filed under oath. W.E. VLASEK stipulates that the following response to the Commission Staff's Fifth Request for Information may be treated by all parties as if the answer was filed under oath.

Respectfully submitted this 5<sup>th</sup> day of September, 2019.



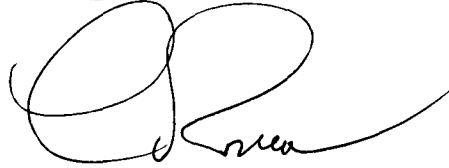
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**ATTORNEY FOR W.E. VLASEK**

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## CERTIFICATE OF SERVICE

I hereby certify that a true and correct copy of the foregoing Response to Commission Staff's Fifth RFI to W.E. Vlasek was served on all parties on the 5<sup>th</sup> day of September, 2019.



Les Romo

### **W.E. VLASEK'S RESPONSE TO COMMISSION STAFF'S FIFTH REQUEST FOR INFORMATION TO W.E. VLASEK**

#### **GENERAL OBJECTIONS:**

(1) W.E. VLASEK 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, its attorneys and/or by any state or other agency to which they have equal access as W.E. VLASEK.

(2) W.E. VLASEK 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, attorneys and/or by any state or other agency to which they have equal access as W.E. VLASEK.

(3) W.E. VLASEK 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) W.E. VLASEK 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) W.E. VLASEK 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 W.E. VLASEK to the PUC Staff's Second Request for Information as if set forth fully within the Response.

#### **CONDITIONS TO RESPONSE:**

1. W.E. VLASEK's responses are based on the present knowledge of his managers and officers, and employees after a reasonable investigation and a reasonable interpretation and construction of the request in providing these responses.

2. W.E. VLASEK reserves the right to redact any portion(s) of otherwise responsive and non-

privileged documents that contain irrelevant, non-responsive or privileged information.

3. W.E. VLASEK will supplement his responses if, and when such may be required by applicable discovery rules to this case, if necessary.

4. Any responses that W.E. VLASEK 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 W.E. VLASEK and/or reasonably available to W.E. VLASEK.

Without waiving these objections, and subject to the afore-said objections and conditions, W.E. VLASEK responds to the PUC Staff's Fifth Request for Information on the attached document, which is incorporated herein by reference for all purposes.

## **ATTACHMENT 5-1**

**SOAH DOCKET NO. 473-19-4089.WS  
DOCKET NO. 48640**

**APPLICANT'S RESPONSE TO COMMISSION STAFF'S FIFTH REQUEST  
FOR INFORMATION TO W. E. VLASEK  
QUESTION NO. STAFF 5-1**

**Staff 5-1** In reference to page 11 of the rate change application, please provide a breakdown of the total 24,097,043 billed gallonage by utility subdivision and by proposed tiers for billing up to 10,000 and over 10,001, as follows:

- a) Shalako Estates;
- b) Canyon Springs;
- c) Mary Meade;
- d) Rustic Hills; and
- e) Village West

**Answer:** Below is a breakdown of gallons billed by utility systems for proposed tiers above and below 10,000 gallons of usage. In addition, in Attachment 5-1 is the breakdown by utility system for billed gallonage below and above 10,000 gallons from the utility's billing system.

<u>System</u>	<u>Gallons: 0 – 9999</u>	<u>Gallons: 10,000 &amp; Above</u>	<u>Totals</u>
Canyon Springs	9,016,337	4,354,523	13,370,860
Shalako Estates	2,131,248	845,352	2,976,600
Mary Meade	1,937,279	1,895,941	3,833,220
Rustic Hills	1,094,539	428,994	1,523,533
Village West	<u>1,138,676</u>	<u>1,198,314</u>	<u>2,336,990</u>
Totals:	15,318,079	8,723,124	24,041,203

**Witness:** Bret W. Fenner, P.E. President B & D Environmental, Inc.

Vlasek Pump  
**Rate Study Report**  
From 01/01/2017 through 12/31/2017

Lanyon Springs

Tier Schema: Tier 2

Tier	Begin Range	End Range	Bill Count	Apt. Count	Usage in Tier
1	0	9999	2317	2317	9016337
2	10000	999999999999	293	293	4354523
				<b>Total Usage</b>	13370860

Vlasek Pump  
**Rate Study Report**  
 From 01/01/2017 through 12/31/2017

Snadake

Tier Schema: Tier 2

Tier	Begin Range	End Range	Bill Count	Apt. Count	Usage in Tier
1	0	9999	481	481	2131248
2	10000	999999999999	82	82	845352
Total Usage					2976600



Vlasek Pump  
**Rate Study Report**  
From 01-01-2017 through 12-31-2017

Marymeade

Tier Schema: Tier 2

Tier	Begin Range	End Range	Bill Count	Apt. Count	Usage in Tier
1	0	9999	761	761	1937279
2	10000	999999999999	71	71	1895941
Total Usage					3833220

Vlasek Pump  
**Rate Study Report**  
From 01/01/2017 through 12/31/2017

RUSTIC HILLS

Tier Schema: Tier 2

Tier	Begin Range	End Range	Bill Count	Apt. Count	Usage in Tier
1	0	9999	397	397	1094539
2	10000	999999999999	34	34	428994
				<b>Total Usage</b>	1523533

Vlasek Pump  
**Rate Study Report**  
 From 01/01/2017 through 12/31/2017

Village West

Tier Schema: Tier 2

Tier	Begin Range	End Range	Bill Count	Apt. Count	Usage in Tier
1	0	9999	385	385	1138676
2	10000	999999999999	54	54	1198314
Total Usage					2336990