



Control Number: 48640



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SOAH DOCKET NO. 473-19-4089.WS

PUC DOCKET NO. 48640

2019 SEP 23 AM 11:49

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

§  
§  
§

BEFORE THE STATE OFFICE  
OF PUBLIC UTILITIES  
ADMINISTRATIVE HEARINGS

**COMMISSION STAFF'S SUPPLEMENTAL RESPONSE TO W. E. VLASEK'S  
SECOND REQUEST FOR INFORMATION  
AND REQUEST FOR PRODUCTION**

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

Dated: September 23, 2019

Respectfully submitted,

**PUBLIC UTILITY COMMISSION OF TEXAS  
LEGAL DIVISION**

Margaret Uhlig Pemberton  
Division Director

Karen S. Hubbard  
Managing Attorney

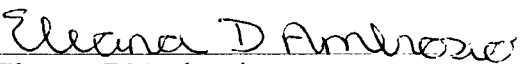


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**CERTIFICATE OF SERVICE**

I certify that a copy of this document will be served on all parties of record September 23, 2019, in accordance with 16 Texas Administrative Code § 22.74.

  
Eleanor D' Ambrosio

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**COMMISSION STAFF'S SUPPLEMENTAL RESPONSE TO W. E. VLASEK'S  
SECOND REQUEST FOR INFORMATION AND  
REQUEST FOR PRODUCTION**

**RFI 2-1**                      Please identify all issues that the Staff claims to have found in the course of or as a result of the Financial Review that the Staff plans to or may use to support the testimony of any witnesses in this case.

**RESPONSE:**              Please see the Direct Testimony of Leila C. Guerrero and the Direct Testimony of Emily Sears.

Prepared by: Eleanor D'Ambrosio  
Sponsor:        Leila Guerrero and Emily Sears

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REQUEST FOR PRODUCTION**

**RFI 2-2**                      Please identify all issues that the Staff claims to have found in the Financial Review that the Staff will or may use in any testimony in the final hearing in this case.

**RESPONSE:**              Please see the Direct Testimony of Leila C. Guerrero and the Direct Testimony of Emily Sears.

Prepared by: Eleanor D'Ambrosio  
Sponsor:        Leila Guerrero and Emily Sears

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**RFI 2-3**                      Please identify each Staff member who was involved in the Financial Review and the duties of each of these Staff members involved in the Financial Review, and identify any information they discovered during the course or as a result of the Financial Review.

**RESPONSE:**              Anna Givens and Darryl Tietjen were involved in the Financial Review in addition to the three Staff members identified in Staff's initial response to this question. Ms. Givens was responsible for the managerial oversight of the Financial Review and Mr. Tietjen was responsible for managerial oversight of the rate of return analysis performed.

                                 Please see the Direct Testimony of Leila C. Guerrero and the Direct Testimony of Emily Sears and the workpapers of Ms. Guerrero and Ms. Sears.

Prepared by: Eleanor D'Ambrosio  
Sponsor:        Leila Guerrero and Emily Sears

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**RFP 2-1**            Provide copies of all studies, reports, compilations, treatises, contracts, correspondence, photographs, graphs, diagrams, maps, charts, financial statements, invoices, bids, checks, governmental records, test results, audits, and other documents reviewed in the course of the Financial Review, and which will be used and relied upon by any witness for you in this cause. In providing the response to this request, please provide the original Staff work papers in their original format, i.e. Excel spreadsheet, Word documents, etc. as they were reviewed by you.

**RESPONSE:**      Please see the workpapers to the direct testimonies of Leila C. Guerrero, Patricia, Garcia, and Emily Sears; Vlasek's application and discovery responses; and the direct testimonies of Les Romo and Bret W. Fenner, P.E..

Prepared by:    Eleanor D'Ambrosio  
Sponsor:        Leila Guerrero and Emily Sears