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DOCKET NO. 48640

**APPLICATION OF W. E. VLASEK FOR § PUBLIC UTILITY COMMISSION
AUTHORITY TO CHANGE RATES § OF TEXAS**

**COMMISSION STAFF'S FOURTH REQUEST FOR INFORMATION
AND SECOND REQUEST FOR ADMISSIONS
TO W. E. VLASEK
QUESTION NOS. STAFF RFI 4-1 THROUGH STAFF RFI 4-3
QUESTION NOS. STAFF RFA 2-1**

Pursuant to 16 Texas Administrative Code (TAC) § 22.144, the Commission Staff (Staff) of the Public Utility Commission of Texas (Commission) requests that W.E. Vlashek, 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 78711-3326.

Dated: July 29, 2019

Respectfully submitted,

**PUBLIC UTILITY COMMISSION OF TEXAS
LEGAL DIVISION**

Margaret Uhlig Pemberton
Division Director

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Managing Attorney



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I certify that a copy of this document will be served on all parties of record July 29, 2019
in accordance with 16 TAC § 22.74.



Alexander Petak

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DEFINITIONS

- A. "W.E. Vlasek," or "you" refers to W.E. Vlasek 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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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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- Staff RFI 4-1** For W. E. Vlasek's tariff that applies to multiple water systems, please describe how the systems on that tariff are substantially similar in facilities, quality of service and cost of service, and how the proposed rates for that tariff promote water conservation for single-family residences and landscape irrigation.
- Staff RFI 4-2** In reference to page 6 of the application, Schedule 1-1, Revenue Requirement Summary, please provide a break-down of the revenue requirement for the test year ending December 31, 2017, provide individual schedule 1-1 by utility systems, as follows:
- a) Shalako Estates;
 - b) Canyon Springs;
 - c) Mary Meade;
 - d) Rustic Hills; and
 - e) Village West
- Staff RFI 4-3** Please provide allocation schedule to allocate costs or expenses to the utility systems and affiliates, if any.

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Staff RFA 2-1

Admit or Deny that W. E. Vlasek is requesting to consolidate, under a single tariffed rate, the systems included in CCN No. 12685 (Shalako Estates & Canyon Springs) and the systems included in CCN No. 11570 (Mary Meade, Rustic Hills, and Village West).