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APPLICATION OF W.E. VLASEK FOR § BEFORE THE STATE OFFICE
AUTHORITY TO CHANGES RATES § OF FILING CLERK
§ ADMINISTRATIVE HEARINGS

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

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 Fourth Request for Information and Second Request for Admission to W.E. VLASEK, Question Nos. Staff 4-1 through 4-3, and Question Nos. RFA 2-1. 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.

Respectfully submitted this 21st day of August, 2019.



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CERTIFICATE OF SERVICE

I hereby certify that a true and correct copy of the foregoing Response to Commission Staff's Fourth

RFIs and Second RFAs to W.E. Vlasek was served on all parties on the 21st day of August, 2019.



Les Romo

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

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 Third Request for Information and Request for Admission as follows:

RESPONSE TO STAFF FOURTH RFIs

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.

RESPONSE: Please see the response to Staff RFI 1-1, and the Prefiled Direct Testimony of Bret W. Fenner, P.E. President, B&D Environmental, Inc. on file in this case.

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

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

RESPONSE: Please see the response to Staff RFI 1-1, and the Prefiled Direct Testimony of Bret W. Fenner, P.E. President, B&D Environmental, Inc. on file in this case.

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

Staff RFI 4-3 Please provide allocation schedule to allocate costs or expenses to the utility systems and affiliates, if any.

RESPONSE: OBJECTION: This request is vague and ambiguous, and the Applicant is not able to determine from the request what is being asked for in this discovery request. Without waiving this objection, to the degree that W.E. VLASEK attempts to understand what information is being requested, the response is: Please see the response to Staff RFI 1-1, and the Prefiled Direct Testimony of Bret W. Fenner, P.E. President, B&D Environmental, Inc. on file in this case.

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

RESPONSE TO SECOND REQUEST FOR ADMISSIONS

Staff RFA 1-1 Admit/Deny that Vlasek Pump Company is requesting to consolidate, under a single tariffed (sic) rate, the systems included in CCN No. 12685 (Shalako Estates & Canyon Springs) and the systems included in CCN No. 11570 (Mary Meade, Rustic Hills & Village West).

RESPONSE: Admit.

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