



Control Number: 48697



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DOCKET NO. 48697

**APPLICATION OF ANDERSON
WATER COMPANY, INC. FOR
AUTHORITY TO CHANGE RATES**

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**PUBLIC UTILITY COMMISSION
OF TEXAS**

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**COMMISSION STAFF'S SECOND REQUEST FOR INFORMATION
TO ANDERSON WATER COMPANY, INC. (ANDERSON WATER COMPANY)
QUESTION NOS. STAFF 2-1 THROUGH STAFF 2-13**

Pursuant to 16 Texas Administrative Code (TAC) § 22.144, the Staff of the Public Utility Commission of Texas (Staff) requests that Anderson Water Company, Inc. (Anderson Water Company) 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.

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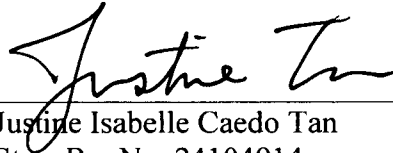
Dated: August 6, 2019

Respectfully submitted,

**PUBLIC UTILITY COMMISSION OF TEXAS
LEGAL DIVISION**

Margaret Uhlig Pemberton
Division Director

Stephen Mack
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 August 6, 2019, in accordance with 16 TAC § 22.74.


Justine Isabelle Caedo Tan

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**COMMISSION STAFF'S SECOND REQUEST FOR INFORMATION
TO ANDERSON WATER COMPANY, INC. (ANDERSON WATER COMPANY)
QUESTION NOS. STAFF 2-1 THROUGH STAFF 2-13**

DEFINITIONS

- A. "Anderson Water Company," or "the utility," refer to Anderson Water Company, Inc. and any person acting or purporting to act on its 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 utility'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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**COMMISSION STAFF'S SECOND REQUEST FOR INFORMATION
TO ANDERSON WATER COMPANY, INC. (ANDERSON WATER COMPANY)
QUESTION NOS. STAFF 2-1 THROUGH STAFF 2-13**

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 SECOND REQUEST FOR INFORMATION
TO ANDERSON WATER COMPANY, INC. (ANDERSON WATER COMPANY)
QUESTION NOS. STAFF 2-1 THROUGH STAFF 2-13**

- Staff 2-1 Please provide the yearly salary by employee name for each employee of Anderson Water Company.
- Staff 2-2 Please provide a detailed description of services rendered by each employee for Anderson Water Company and for Anderson Plumbing Company, respectively.
- Staff 2-3 Does Anderson Plumbing Company provide any plumbing services in addition to sales of plumbing supplies?
- Staff 2-4 Please provide the names of any employees or contract labor persons who are paid by Anderson Water Company and also are licensed plumbers.
- Staff 2-5 Please provide the last 24 months of wireless phone bills for Anderson Water Company.
- Staff 2-6 Please provide transaction details for individual sales and services performed by Anderson Plumbing Company for the test year.
- Staff 2-7 Please provide any records available supporting the amount of time spent by each employee or contract labor personnel on Anderson Water Company and Anderson Plumbing Company, respectively.
- Staff 2-8 Please provide the mileage log for vehicles used for Anderson Water Company.
- Staff 2-9 Please provide the mileage log for vehicles used for Anderson Plumbing Company.
- Staff 2-10 If mileage logs are not available, provide the amount of time the vehicles are used by Anderson Water Company, Anderson Plumbing Company, and personal use.
- Staff 2-11 Please state if any of the assets listed in the application are used for Anderson Plumbing Company.
- Staff 2-12 Please provide details, such as type and function, on each of the vehicles listed in the utility plant in service.
- Staff 2-13 Please provide details, such as type and function, on each of the heavy equipment assets listed in the plant in service.