



Control Number: 48819



Item Number: 211

Addendum StartPage: 0

SOAH DOCKET NO. 473-20-1674.WS

PUC DOCKET NO. 48819

2021 JUN -1 PM 12:06

APPLICATION OF NORTHTOWN
ACRES WATER SUPPLY FOR
AUTHORITY TO CHANGE RATES

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BEFORE THE STATE OFFICE
OF
ADMINISTRATIVE HEARINGS

**COMMISSION STAFF'S FIFTH REQUEST FOR
INFORMATION TO NORTHTOWN ACRES WATER SUPPLY
QUESTION NOS. STAFF 5-1 THROUGH 5-15**

Pursuant to 16 Texas Administrative Code (TAC) § 22.144, the Staff of the Public Utility Commission of Texas (Staff) requests that Northtown Acres Water Supply, by and through its attorney 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 responses to the Requests for Information by filing with the Commission solely through the Interchange on the Commission's website and provide notice, by email, to all other parties that the pleading or document has been filed with the Commission, unless otherwise ordered by the presiding officer pursuant to the Order Suspending Rules in Docket No. 50664.

Dated: June 1, 2021

Respectfully Submitted,

**PUBLIC UTILITY COMMISSION OF TEXAS
LEGAL DIVISION**

Rachelle Robles
Division Director

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/s/ John Harrison
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**SOAH DOCKET NO. 473-20-1674.WS
PUC DOCKET NO. 48819**

CERTIFICATE OF SERVICE

I certify that, unless otherwise ordered by the presiding officer, notice of the filing of this document was provided to all parties of record on June 1, 2021 in accordance with the Order Suspending Rules filed in Project No. 50664.

/s/ John Harrison
John Harrison

**SOAH DOCKET NO. 473-20-1674.WS
PUC DOCKET NO. 48819**

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DEFINITIONS

- A. "Northtown Acres", "Company", or "you" refers to Northtown Acres Water Supply 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.

**SOAH DOCKET NO. 473-20-1674.WS
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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.

SOAH DOCKET NO. 473-20-1674.WS
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- Staff 5-1 Please admit or deny that North Petty Chapel Water Supply is an affiliate of Northtown Acres. If deny, please explain the relationship between North Petty Chapel Water Supply and Northtown Acres.
- Staff 5-2 Please admit or deny that North Petty Chapel Water Supply is a legal entity that is separate from Northtown Acres Water Supply. If deny, please explain who or what the label North Petty Chapel Water Supply refers to in relation to Northtown Acres' business structure or operations.
- Staff 5-3 If the application includes expenses common to both North Petty Chapel Water Supply and Northtown Acres, please explain if and how these common costs are allocated between North Petty Chapel Water Supply and Northtown Acres.
- Staff 5-4 If the application includes expenses that are not common to both North Petty Chapel Water Supply and Northtown Acres, please describe the types of expenses that are not common and identify the amount of the expenses included in the amended application, by NARUC account, that are direct billed to North Petty Chapel Water Supply and the amount direct billed to Northtown Acres.
- Staff 5-5 If the response to Staff 5-1 is admit, please provide documentation demonstrating that the price charged to Northtown Acres for services provided by North Petty Chapel Water Supply is no higher than prices charged to other affiliates or unaffiliated third parties for the same item or items (Tex. Water Code Ann. § 13.185(e)).
- Staff 5-6 Please clarify if the requested revenue requirement includes (1) a salary for Sheroll Richardson only; (2) a salary for Roger Richardson only; or (3) a salary for Sheroll Richardson and a salary for Roger Richardson.
- Staff 5-7 Please provide a contract, service agreement, or other documentation demonstrating that Northtown Acres has started obtaining service from the contract positions included in the requested revenue requirement.
- Staff 5-8 Please identify the amount of the total requested contract labor expense that is for: (1) the part time contractors; and (2) the accountant.
- Staff 5-9 Please provide invoices from the City of Corsicana for purchased water during the test year used in the amended application.

- Staff 5-10 Please refer to the Northtown Acres invoices labeled “Estimate” in the top right hand corner on pages 180, 181, 186, 207, 210, 211, 213, 215 and 216 of the amended application. Please identify the person or entity that performed the work or provided the service described in each invoice.
- Staff 5-11 Please refer to the invoices on the pages listed in Staff 5-10 and provide the actual invoices that correspond to the nine invoices labeled “Estimate.”
- Staff 5-12 Please identify the beneficiary for the Farm Bureau life insurance policy.
- Staff 5-13 Please identify the beneficiary of the Symetra life insurance policy.
- Staff 5-14 Please refer to Schedule I-1 of the amended application. Please provide detailed invoices for rate case expenses for the test year and the known and measurable changes.
- Staff 5-15 Please refer to Schedule I-1 of the amended application. Please provide detailed statements and proof of payment for taxes other than income for the test year and known and measurable changes.