

Control Number: 49154



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**DOCKET NO. 49154  
SOAH DOCKET NO. 473-19-5677.WS**

**RATEPAYERS' APPEAL OF THE  
DECISION BY LAGUNA MADRE  
WATER DISTRICT TO CHANGE  
RATES**

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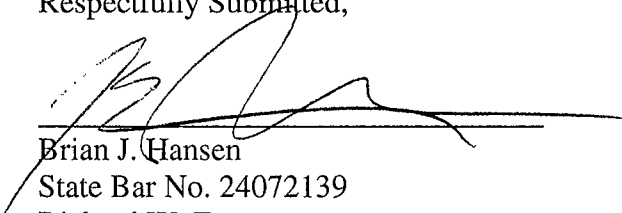
**STATE OFFICE OF  
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**LAGUNA MADRE WATER DISTRICT'S RESPONSE TO  
COMMISSION STAFF'S FIRST REQUEST FOR INFORMATION  
TO LAGUNA MADRE WATER DISTRICT  
QUESTION NO. STAFF 1-1 THROUGH STAFF 1-16**

COMES NOW, Laguna Madre Water District, Respondent in the above-referenced matter, and pursuant to the Tex. Admin. Code Ann. § 22.144 (TAC), makes and files this its Responses to Commission Staff's First Request for Information to Laguna Madre Water District Question No. Staff 1-1 through Staff 1-16.

Respectfully Submitted,

  
Brian J. Hansen  
State Bar No. 24072139  
Richard W. Fryer  
State Bar No. 24085316

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Email: Email@fryerandhansen.com

**ATTORNEYS FOR RESPONDENT  
LAGUNA MADRE WATER DISTRICT**

584

## **CERTIFICATE OF SERVICE**

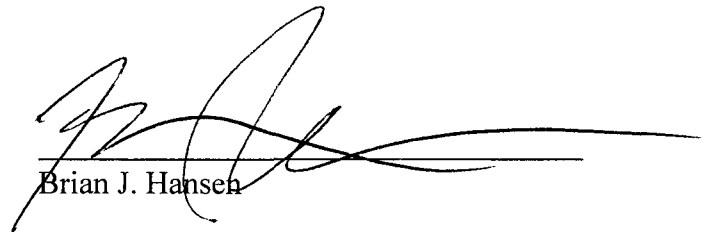
A true and correct copy of the above and foregoing **Laguna Madre Water District's Responses to Commission Staff's First Request for Information to Laguna Madre Water District Question No. Staff 1-1 Through Staff 1-16** has been served on all parties of record on the 27<sup>th</sup> day of November, 2019 as follows:

**Via U.S. Postal Service:**

Kourtnee Jinks  
Public Utilities Commission of Texas Legal Division  
P.O. Box 13326  
Austin, Texas 78711-3326  
*Attorney for Public Utilities Commission of Texas*

**Via U.S. Postal Service:**

Liliana Elizondo  
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Brian J. Hansen

**SOAH DOCKET NO. 473-19-5677.WS  
PUC DOCKET NO. 49154**

**LAGUNA MADRE WATER DISTRICT'S RESPONSE TO  
COMMISSION STAFF'S FIRST REQUEST FOR INFORMATION  
TO LAGUNA MADRE WATER DISTRICT  
QUESTION NO. STAFF 1-1 THROUGH STAFF 1-16**

Staff 1-1      Please provide a copy of the rate study used to determine the rate increase subject to this appeal.

RESPONSE: See Exhibit "A" (LMWD 0001 - LMWD 0105)

Staff 1-2      Please provide all information used by the board of directors of Laguna Madre Water District to determine the rate increase subject to this appeal.

RESPONSE: See Exhibit "B" (LMWD 0106 - LMWD 0199)

Staff 1-3      Please provide copy of the tariffs or rate schedules before and after the rate increase.

RESPONSE: See Exhibit "C" (LMWD 0200 - LMWD 0206)

Staff 1-4      Please provide a copy of Laguna Madre's annual budgets approved by the board of directors for the fiscal years (FY) 2017, 2018, and 2019.

RESPONSE: See Exhibit "D" (LMWD 0207 - LMWD 0329)

Staff 1-5      Please provide a copy of Laguna Madre's audited financial statements, including the notes to basic financial statements and required Texas supplemental schedules, and any other financial reports for the FY 2016, 2017, and 2018. If the audited financial statements are not available, please provide the unaudited financial statements.

RESPONSE: See Exhibit "E" (LMWD 0330 - LMWD 0597)

Staff 1-6      Please provide a schedule for Bonds Issued or any Debt Issuances for 2018 and 2019, with the following column headings:

- a.      Purpose;
- b.      Creditor;
- c.      Description of the bonds or debt certificates;
- d.      Original Amount;
- e.      Year of Issue;
- f.      Final Maturity or Maturity Date;
- g.      Interest Rate;
- h.      Amount of Annual Payments;
- i.      Balance as of 9/30/2018, or end of the FY; and

- j. Annual debt service outstanding balance broken down by principle and interest for 2017, 2018, and 2019.

RESPONSE: See Exhibit "F" (LMWD 0598 - LMWD 0606)

Staff 1-7 Please provide a schedule of Laguna Madre's property plant and equipment for the FY 2017 and 2018, with the following column headings:

- a. Item or account name;
- b. Date of acquisition or date placed in service;
- c. Original Cost;
- d. Estimated life of the asset;
- e. Annual Depreciation;
- f. Accumulated Depreciation;
- g. Net Book Value; and
- h. Discuss whether the item is used to produce or deliver water to the appellant in this case.

RESPONSE: See Exhibit "G" (LMWD 0607 - LMWD 0678)

Staff 1-8 Please provide copies of contracts between Laguna Madre with any company, agency, or any service provider for the years 2017, 2018 and 2019.

RESPONSE: See Exhibit "H" (LMWD 0679 - LMWD 17968)

Staff 1-9 Please provide copies of contracts with all commercial, non-residential, wholesale, and non-potable water customers of Laguna Madre.

RESPONSE: See Exhibit "I" (LMWD 17969 - LMWD 17986)

Staff 1-10 Please provide copies of the minutes of Laguna Madre's board meetings when the rate increase to customers were discussed and approved.

RESPONSE: See Exhibit "J" (LMWD 17987 - LMWD 18109)

Staff 1-11 Please provide a schedule of revenues for FY 2017, 2018 and 2019, broken down by base rate revenues (gallage charges and minumum monthly or annual charges, and other income or revenues, such as tap fees and late fees).

RESPONSE: See Exhibit "K" (LMWD 18110 - LMWD 18111)

Staff 1-12 Please provide the number of customers of Laguna Madre for FY ending 2017 and 2018. Please classify the customers as to residential, commercial, etc.

RESPONSE: See Exhibit "L" (LMWD 18112 - LMWD 18113)

Staff 1-13 Please provide a list of Laguna Madre's customers for FY ending 2017 and 2018.

RESPONSE: See Exhibit "M" (LMWD 18114 - LMWD 18341)

Staff 1-14 Please provide copies of tax returns, any IRS forms, or other documents filed with the Internal Revenue Service for the years ending 2017 and 2018.

RESPONSE: See Exhibit "N" (LMWD 18342; and LMWD 18502 - 18504)

Staff 1-15 Please provide a list of Laguna Madre's officers and board of directors as of FY 2018 and 2019.

RESPONSE: See Exhibit "O" (LMWD 18343 - LMWD 18345)

Staff 1-16 Please provide a list of officers and employees as of December 31, 2018, of Laguna Madre with the following column headings:

- a. Name;
- b. Position;
- c. Date employed;
- d. Date terminated, if applicable;
- e. Salary per hour, month, or year, where applicable;
- f. Number of hours work per week; and
- g. Detailed job description.

RESPONSE: See Exhibit "P" (LMWD 18346 - LMWD 18501)

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LMWD 0001 - LMWD 18504

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