



## Filing Receipt

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**SOAH DOCKET NO. 473-21-2237.WS**  
**PUC DOCKET NO. 50197**

<b>APPLICATION OF TIMBERCREST</b>	<b>§</b>	<b>BEFORE THE STATE OFFICE</b>
<b>PARTNERS LLC FOR AUTHORITY</b>	<b>§</b>	<b>OF</b>
<b>TO CHANGE RATES</b>	<b>§</b>	<b>ADMINISTRATIVE HEARINGS</b>

**COMMISSION STAFF'S SIXTH REQUEST FOR INFORMATION**  
**TO TIMBERCREST PARTNERS, LLC**  
**QUESTION NOS. STAFF 6-1 THROUGH STAFF 6-7**

Pursuant to 16 Texas Administrative Code (TAC) § 22.144 of the Commission's Procedural Rules, the Staff of the Public Utility Commission of Texas (Staff) requests that Timbercrest Partners, LLC (Timbercrest) and through its attorneys of record, provide the following information and answer the following questions under oath. The questions 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 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. 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 Second Order Suspending Rules in Docket No. 50664.

Dated: July 28, 2022

Respectfully submitted,

**PUBLIC UTILITY COMMISSION OF TEXAS  
LEGAL DIVISION**

Keith Rogas  
Division Director

Marisa Lopez Wagley  
Managing Attorney

/s/ Kourtnee Jinks  
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**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 via electronic mail on July 28, 2022, in accordance with the Order Suspending Rules issued in Project No. 50664.

/s/ Kourtnee Jinks  
Kourtnee Jinks

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**COMMISSION STAFF'S SIXTH REQUEST FOR INFORMATION  
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**DEFINITIONS**

- 1) "Timbercrest," "Company," or "you" refers to Timbercrest Partners, LLC and any person acting or purporting to act on their behalf, including without limitation, attorneys, agents, advisors, investigators, representatives, employees, or other persons.
- 2) "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 6-1** Please refer to spreadsheet "Class\_C\_Rate-Tariff\_Change\_Schedules – TIMBERCREST FINAL," sheet "WP COSS Alloc table," row 23. Please confirm or deny whether the CCUST class allocation erroneously referenced the water and sewer customer connections instead of commercial and residential customer connections.
- Staff 6-2** Please explain if Timbercrest proposes to allocate sewer-related costs to the commercial and residential class based on water customer connections.
- Staff 6-3** Please refer to spreadsheet "Class\_C\_Rate-Tariff\_Change\_Schedules – TIMBERCREST FINAL," sheet "WP Normalize Vols for Rates," row 30. Please provide the sewer meter equivalents for the commercial class.
- Staff 6-4** Please refer to spreadsheet "Class\_C\_Rate-Tariff\_Change\_Schedules – TIMBERCREST FINAL," sheet "WP COSS Alloc table," row 24. Please confirm or deny that the CVOL class allocation was calculated based on water volumes billed.
- Staff 6-5** If the response to Staff 6-4 is confirm, please explain the rationale behind Timbercrest's proposal to allocate sewer-related costs to the commercial and residential class based on water volumes billed.
- Staff 6-6** Please refer to spreadsheet "Class\_C\_Rate-Tariff\_Change\_Schedules – TIMBERCREST FINAL," sheet "WP COSS Alloc table," row 25. Please confirm or deny that the CCUSTDEM class allocation was calculated based on water meter equivalents.
- Staff 6-7** If the response to Staff 6-6 is confirm, please explain the rationale behind Timbercrest's proposal to allocate sewer-related costs to the commercial and residential class based on water meter equivalents.