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SOAH DOCKET NO. 473-21-2237.WS
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APPLICATION OF TIMBERCREST PARTNERS LLC FOR AUTHORITY TO CHANGE RATES	§ § §	BEFORE THE STATE OFFICE OF ADMINISTRATIVE HEARINGS
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**COMMISSION STAFF’S EIGHTH REQUEST FOR INFORMATION
TO TIMBERCREST PARTNERS, LLC
QUESTION NOS. STAFF 8-1 THROUGH STAFF 8-14**

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: September 1, 2022

Respectfully submitted,

**PUBLIC UTILITY COMMISSION OF TEXAS
LEGAL DIVISION**

Keith Rogas
Division Director

Marisa Lopez Wagley
Managing Attorney

/s/ Kevin R. Bartz

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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 September 1, 2022, in accordance with the Order Suspending Rules issued in Project No. 50664.

/s/ Kevin R. Bartz

Kevin R. Bartz

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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 8-1** Please refer to Timbercrest's application at page 8, "Profit and Loss Functionalization of Utility Related Accounts." Please provide a description of the expense category 501070 Salaries – Bonus in the amount of \$12,350. Please include a copy of Timbercrest's policy for paying any bonus, the basis for determining the amount of the payment, and the list of employees that received the bonus payments.
- Staff 8-2** For any bonus payments described in Staff X-1, please provide the amount included in Timbercrest's requested revenue requirement by NARUC account for water and wastewater.
- Staff 8-3** Please refer to Timbercrest's application at page 8, "Profit and Loss Functionalization of Utility Related Accounts." Please explain in detail why Timbercrest does not allocate its Revenue Account 40560 Property Tax Income to the utility function, yet it allocates 22.59% of Expense Account 660 Property Taxes to the regulated utility function.
- Staff 8-4** Please refer to Timbercrest's application at page 8, "Profit and Loss Functionalization of Utility Related Accounts." Please explain in detail why Timbercrest does not allocate its Revenue Account 40570 Insurance Income to the utility function, yet it allocates 28.69% of Expense Account 580 Insurance to the regulated utility function.
- Staff 8-5** Please refer to Timbercrest's application at page 8, "Profit and Loss Functionalization of Utility Related Accounts." Please explain in detail why Timbercrest does not allocate its revenue related to Maintenance & Inspection Fees Account 40635 to the utility function, yet it allocates various percentages of Expense Account 530 Repairs and Maintenance to the regulated utility function.
- Staff 8-6** Please refer to the Timbercrest's application at page 18, "Customer Class Cost of Service Study." Please provide documentation to support insurance expenses (umbrella, general, auto, and bond coverage) of \$7,993 for water and \$8087 for sewer.
- Staff 8-7** Please refer to Timbercrest's application at page 18, "Customer Class Cost of Service Study." Please provide documentation to support professional services expenses (legal and consulting) of \$2,469 for water and \$2,461 for sewer.

- Staff 8-8** Please refer to Timbercrest's application at page 18, "Customer Class Cost of Service Study." Please provide documentation to support accounting expenses of \$2,196 for water and \$2,189 for sewer.
- Staff 8-9** Please provide documentation supporting the current pumpage fee from North Harris County Regional Water Authority.
- Staff 8-10** Please refer to Timbercrest's response to Staff RFI 3-5 at bates page 47. As it pertains to Timbercrest Partners, LLC's requested revenue requirement, please explain the reasonableness and necessity of the Nevada Secretary of State fee paid for Kuykendahl LLC.
- Staff 8-11** Please refer to Timbercrest's response to Staff RFI 3-5 at bates page 48. As it pertains to Timbercrest Partners, LLC's requested revenue requirement, please explain the reasonableness and necessity of the Nevada Secretary of State fee paid for Timbercrest Limited Partnership.
- Staff 8-12** Please refer to Timbercrest's response to Staff RFI 3-5 at bates page 50. As it pertains to Timbercrest Partners, LLC's requested revenue requirement, please explain the reasonableness and necessity of the Delaware Division of Corporations State fee paid for Augusta Woods, LLC.
- Staff 8-13** Please refer to Timbercrest's response to Staff RFI 3-5 at bates pages 62. As it pertains to Timbercrest Partners, LLC's requested revenue requirement, please explain the reasonableness and necessity of the Manufactured Housing Institute fee paid for Harmony Communities.
- Staff 8-14** Please refer to Timbercrest's response to Staff RFI 3-5 at bates pages 63. As it pertains to Timbercrest Partners, LLC's requested revenue requirement, please explain the reasonableness and necessity of the Texas Manufactured Housing Association fee paid for Harmony-Timbercrest Village.