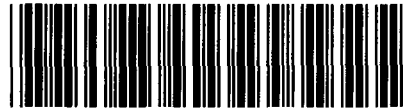


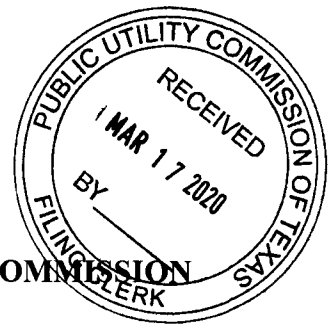


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DOCKET NO. 50200

APPLICATION UNDINE TEXAS, LLC	§	PUBLIC UTILITY COMMISSION
AND UNDINE TEXAS	§	
ENVIRONMENTAL, LLC FOR	§	OF TEXAS
AUTHORITY TO CHANGE RATES	§	

**COMMISSION STAFF'S SECOND REQUEST FOR INFORMATION
TO UNDINE TEXAS, LLC AND UNDINE TEXAS ENVIRONMENTAL, LLC
QUESTION NOS. STAFF 2-1 THROUGH 2-11**

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 the Undine Texas, LLC 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.

Dated: March 17, 2020

Respectfully submitted,

**PUBLIC UTILITY COMMISSION OF TEXAS
LEGAL DIVISION**

Rachelle Nicolette Robles
Division Director

Heath D. Armstrong
Managing Attorney

/s/ Eleanor D' Ambrosio

Eleanor D' Ambrosio
State Bar No. 24097559
John Harrison
State Bar No. 24097806
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P.O. Box 13326
Austin, Texas 78711-3326
(512) 936-7021
(512) 936-7268 (facsimile)
Eleanor.Dambrosio@puc.texas.gov

**DOCKET NO. 50200
CERTIFICATE OF SERVICE**

I certify that a copy of this document will be served on all parties of record on March 17, 2020 by electronic mail.

/s/ Eleanor D' Ambrosio

Eleanor D' Ambrosio

DOCKET NO. 50200

**COMMISSION STAFF'S SECOND REQUEST FOR INFORMATION
TO UNDINE TEXAS, LLC AND UNDINE TEXAS ENVIRONMENTAL, LLC
QUESTION NOS. STAFF 2-1 THROUGH 2-11**

DEFINITIONS

- 1) "UT" refers to Undine Texas, 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) "UTE" refers to Undine Texas Environmental, LLC and any person acting or purporting to act on their behalf, including without limitation, attorneys, agents, advisors, investigators, representatives, employees or other persons.

- 3) "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.

DOCKET NO. 50200

**COMMISSION STAFF'S SECOND REQUEST FOR INFORMATION
TO UNDINE TEXAS, LLC AND UNDINE TEXAS ENVIRONMENTAL, LLC
QUESTION NOS. STAFF 2-1 THROUGH 2-11**

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.

DOCKET NO. 50200

**COMMISSION STAFF'S SECOND REQUEST FOR INFORMATION
TO UNDINE TEXAS, LLC AND UNDINE TEXAS ENVIRONMENTAL, LLC
QUESTION NOS. STAFF 2-1 THROUGH 2-11**

- Staff 2-1** Reference Schedule WP-III-2, Orbit tab, Line 935, Transmission and Distribution Plant, Various, Net Plant: \$9,955.19. Provide receipts or an explanation and including the calculation for the Net Plant amount.
- Staff 2-2** Reference Schedule WP-III-2, Suburban tab, Line 24, Source of Supply, Beaumont Place, leak on mail line at 13235 Kinsman, Net Plant \$1,611.68. Provide receipts or an explanation and include the calculation for the Net Plant amount.
- Staff 2-3** Reference Schedule WP-III-2, Suburban tab, Line 25, Source of Supply, Castlewood, AC main break at 2700 Balmorhea Ave, Net Plant \$3,270.77. Provide receipts or an explanation and include the calculation for the Net Plant amount.
- Staff 2-4** Reference Schedule WP-III-2, Suburban tab, Line 26, Source of Supply, Beaumont Place, repair main break at 12907 Gladden Dr, Net Plant \$1,348.44. Provide receipts or an explanation and include the calculation for the Net Plant amount.
- Staff 2-5** Reference Schedule WP-III-2, Suburban tab, Line 149, Transmission and Distribution Plant, Reservoir Acres, main repair at 8021 Errington, Net Plant \$1,011.59. Provide receipts or an explanation and include the calculation for the Net Plant amount.
- Staff 2-6** Reference Schedule WP-III-2, Suburban tab, Line 150, Transmission and Distribution Plant, Cypress Bend, main line repair at 13305 Flagstaff, Net Plant \$1,377.85. Provide receipts or an explanation and include the calculation for the Net Plant amount.
- Staff 2-7** Reference Schedule II-3 Operating Exp(W), Contract Work totaling \$1,892,180. Provide all documentation, including but not limited to, invoices and work orders to support the requested total amount. Please also separate documentation per system (i.e., Orbit Water, Suburban, etc.).
- Staff 2-8** Reference Schedule II-3 Operating Exp(W), Miscellaneous Known & Measurable (K&M) Change of \$1,847,182. Provide a detailed breakdown for the K&M changes.
- Staff 2-9** Reference Schedule II-3 Operating Exp(S), Miscellaneous K&M Change of \$581,576. Provide a detailed breakdown for the K&M changes.

Staff 2-10 Provide copies of the depreciation schedules or other documents used to determine the original cost of the water assets acquired via sale, transfer, merger applications with the following: Orbit, Consumers, Suburban, Community, Chuck Bell, and Gulf Coast.

Staff 2-11 Provide copies of the depreciation schedules or other documents used to determine the original cost of the sewer assets acquired via sale, transfer, merger applications with the following: Orbit, EMCAD, Bolivar Utility Services, and Gulf Coast.