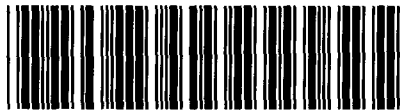


Control Number: 50200



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Addendum StartPage: 0

SOAH DOCKET NO. 473-20-3110.WS
PUC DOCKET NO. 50200

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APPLICATION OF UNDINE TEXAS, § BEFORE THE STATE OFFICE
LLC AND UNDINE TEXAS § OF FILING CLERK
ENVIRONMENTAL, LLC FOR § ADMINISTRATIVE HEARINGS
AUTHORITY TO CHANGE RATES §

**OFFICE OF PUBLIC UTILITY COUNSEL'S
SECOND REQUEST FOR INFORMATION TO
UNDINE TEXAS, LLC AND UNDINE TEXAS ENVIRONMENTAL, LLC - REDACTED**

Pursuant to 16 Texas Administrative Code ("TAC") § 22.144, the Office of Public Utility Counsel ("OPUC") submits this Second Request for Information to Undine Texas, LLC ("UT") and Undine Texas Environmental, LLC ("UTE"). OPUC requests that UT and UTE provide answers to the request for information under oath as required by 16 TAC § 22.144(c)(2)(F) within the timeframe specified in the procedural schedule in this proceeding. OPUC further requests that UT and UTE provide an answer to the questions and sub-questions in the order listed below with sufficient detailed information to provide a complete and accurate answer to each question and sub-question.

Definitions

1. "UT," "UTE," the "Company," "Applicant," "You," and "Your" refer to Undine Texas, LLC and Undine Texas Environmental, LLC and their affiliates, subsidiaries, 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" and "documents" include any written, recorded, filmed, or graphic matter, whether produced, reproduced, or on paper, cards, tape, film, electronic facsimile, computer storage device, or any other media, including, but not limited to, electronic mail (e-mail), memoranda, notes, analyses, minutes, records, photographs, correspondence, telegrams, diaries, bookkeeping entries, financial statements, tax returns, checks, check stubs, reports, studies, charts, graphs, statements, notebooks, handwritten notes, applications, contracts, agreements, books, pamphlets, periodicals, appointment calendars, records and recordings of oral conversations, work papers, observations, commercial

practice manuals, reports, summaries of interviews, reports of consultants, appraisals, forecasts, tape recordings, or any form of recording that is capable of being transcribed into written form.

Instructions

1. The Definitions, Instructions, and Claim of Privilege sections set forth in this request for information apply to these questions.
2. In providing an answer to each question, please furnish all of the information that is in your possession, custody, or control, as defined by Texas Rules of Civil Procedure (Tex. R. Civ. Proc.) 192.7(b), including information in the possession, custody, or control of your affiliates, subsidiaries, and any person acting or purporting to act on their behalf, including without limitation, attorneys, agents, advisors, investigators, representatives, employees, or other persons.
3. Please answer each question based upon your knowledge, information, or belief, and state whether each answer is based upon your knowledge, information, or belief.
4. If you have possession, custody, or control, as defined by Tex. R. Civ. Proc. 192.7(b), of an original requested document, please produce the original requested document or a complete copy of the original requested document and all copies that are different in any way from the original requested document, whether by interlineation, receipt stamp, or notation.
5. If you do not have possession, custody, or control of an original requested document, please produce copies of the document, however made, in your possession, custody, or control. If any requested document is not in your possession, custody, or control, please explain why the document is not in your possession, custody, or control and provide the current location and custodian of the requested document or any copy, summary, or other form of the requested document thereof.
6. If there is any confusion about a question, please contact the undersigned counsel for clarification.
7. In providing your response to a question, please start each response on a separate page and type, at the top of the page, the question that is being answered by the response.
8. As part of the response to each question, please state, at the bottom of the answer to the question, the name and job position of each person(s) who participated in any way, other

than by providing clerical assistance, in the preparation of the answer to the question. If the question has sub-parts, please identify each person(s) by name and job position that participated in any way, other than by providing clerical assistance, in the preparation of the answer for each sub-part of the question.

9. Please state the name of the witness in this docket who will sponsor the answer to the question and/or sub-part of the question and who will swear to the truthfulness of the answer to the question and/or sub-part of the question.
10. Please provide individual responses to questions as each response becomes available, rather than waiting to provide all of the responses to the questions at the same time.
11. These questions are continuing in nature. If there is a change in circumstances or facts or if you receive or generate additional information that changes your answer to a question between the time of your original response and the time of the hearing, then you should submit, under oath, a supplemental response to your earlier answer to the question.
12. If you consider any question to be unduly burdensome, or if the response would require the production of a voluminous amount of material, please contact the undersigned counsel, as soon as possible, to discuss the situation and try to resolve the issue. Furthermore, if you object to any question on the grounds that the question seeks confidential information, or on any other grounds, please contact the undersigned counsel, as soon as possible, to discuss the situation and try to resolve the issue.
13. If the response to any question is voluminous, please make available all of the voluminous material at a designated location in Austin. Please provide a detailed index for the voluminous material with your response to the question to enable efficient review of the material. The index should include information sufficient to locate each individual document by page, file, and box number, date of each document, title of each document, description of each document if no document title exists, name of the preparer of each document, and length of each document.
14. If the requested information is included in previously furnished exhibits, workpapers, or responses to other discovery inquiries or otherwise, in hard copy or electronic format, please furnish specific references thereto, including Bates Stamp page citations and detailed cross-references to the previously furnished information.

15. If a question requests the production of copyrighted material, you may provide a list of such material, including the title, publisher, author, edition, and page references relied on or otherwise relevant to the question.

Claim of Privilege

If any document is withheld under any claim of privilege, please provide a list that identifies each document for which a privilege is being claimed, including the date, sender, recipient(s) of the privileged document, recipient(s) of copies of the privileged document, subject matter of the privileged document, and the basis upon which a privilege is being claimed by the Company.

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- 2-1. Please reference Confidential Workpapers: WP-II-5 W&S, WP-II-6 W&S, WP-II-7 (a)&(b) and WP-II-P Affiliate Overhead, for Account 801.1 – Employees Salaries & Wages; Account 803.1 – Officers Salaries & Wages and all associated tax and benefit accounts. Please provide details on the Capitalization of Salaries & Benefits for 2018 and each Quarter of 2019. Indicate which employee or portion of each employee's salary that was capitalized and the method for determining the amount capitalized.
- 2-2. Please reference Confidential Workpapers: WP-II-5 W&S, WP-II-6 W&S, WP-II-7 (a)&(b) and WP-II-P Affiliate Overhead, for Account 805 – Internet Service & IP Phones. Please indicate the physical address of all locations for which recovery of Internet Service Expense is requested. If the address provided is not a physical office location of UT or UTE, please indicate how internet service to that address is of benefit in providing service to customers of UT or UTE.
- 2-3. Please reference Confidential Workpapers: WP-II-5 W&S, WP-II-6 W&S, WP-II-7 (a)&(b) and WP-II-P Affiliate Overhead, for Account 825 – Computer & Other IT Related Exp:
- a. Please provide information on the [REDACTED] that occurred in approximately December 2018. Please provide a narrative description of how customers were impacted by this event and indicate the specific line-items of expense that were associated with addressing this issue.
 - b. Please provide information about [REDACTED]. Specifically, is [REDACTED] a contract employee? If so, please provide any agreements in place between Undine Operating, LLC or the Company and [REDACTED] or his employer. For [REDACTED] overtime on 6/4/2019 and 7/1/2019, please indicate the reason for the overtime.
 - c. Please provide information about the [REDACTED]. Specifically, provide a narrative description of the project. Further, indicate if this is a one-time project that will serve UT or UTE and its customers over multiple years? Please indicate the specific line-items of expense that were associated with this project.
 - d. Please provide information about the Emaint Project. Specifically, provide a narrative description of the project. Further, indicate if this is a one-time project that will serve UT or UTE and its customers over multiple years? Please indicate the specific line-items of expense that were associated with this project.
- 2-4. Please reference Confidential Workpapers: WP-II-5 W&S, WP-II-6 W&S, WP-II-7 (a)&(b) and WP-II-P Affiliate Overhead, for Account 830 – Contract Services – IT. Please provide a copy of the agreement between Undine Operating, LLC and iDominium Corporation.

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- 2-5. Please reference Confidential Workpapers: WP-II-5 W&S, WP-II-6 W&S, WP-II-7 (a)&(b) and WP-II-P Affiliate Overhead, for Account 833.1 – [REDACTED]. Please provide a narrative description of the merits of this dispute and the ultimate outcome of the proceeding if concluded. Please provide the names of the parties to the [REDACTED], the cause number, a citation to the case or applicable PUC Docket number.
- 2-6. Please reference Confidential Workpapers: WP-II-5 W&S, WP-II-6 W&S, WP-II-7 (a)&(b) and WP-II-P Affiliate Overhead, for Account 833 – Contract Services – Legal – Other. Please provide a copy of the customer [REDACTED] specific to [REDACTED] addressed by [REDACTED] on 10/31/2018.
- 2-7. Please reference Confidential Workpapers: WP-II-5 W&S, WP-II-6 W&S, WP-II-7 (a)&(b) and WP-II-P Affiliate Overhead, for Account 836 – Contract Services:
- a. Please provide timesheets or records for the following individuals which detail the hours worked, the work performed, and services provided to Undine Operating, LLC, and the hourly rate paid:
 - i. [REDACTED]
 - ii. [REDACTED]
 - iii. [REDACTED]
 - iv. [REDACTED]
 - v. [REDACTED]
 - b. Please provide all invoices or receipts supporting the accounting entry on 4/16/2019 of \$[REDACTED] related to the [REDACTED] Agreement.
- 2-8. Please reference Confidential Workpapers: WP-II-5 W&S, WP-II-6 W&S, WP-II-7 (a)&(b) and WP-II-P Affiliate Overhead, for Account 840 – Office Maintenance. Please provide a copy of the service agreement between Undine Operating, LLC and the following entities:
- a. J&W Janitorial
 - b. Sharp Electronics Corporation
 - c. Cintas
- 2-9. Please reference Confidential Workpapers: WP-II-5 W&S, WP-II-6 W&S, WP-II-7 (a)&(b) and WP-II-P Affiliate Overhead, for Account 850.1 – Mileage. Please provide all mileage logs maintained by employees of UT, UTE or the Company as supporting documentation for reimbursement during the test year.

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- 2-10.** Please reference Confidential Workpapers: WP-II-5 W&S, WP-II-6 W&S, WP-II-7 (a)&(b) and WP-II-P Affiliate Overhead, for Account 850 – Corporate Travel – Other. Please provide receipts supporting all requested line-items of expense within this account.

- 2-11.** Please reference Confidential Workpapers: WP-II-5 W&S, WP-II-6 W&S, WP-II-7 (a)&(b) and WP-II-P Affiliate Overhead, for Account 875.1 – Meals & Entertainment. Please provide receipts supporting all requested line-items of expense within this account.

- 2-12.** Please reference Confidential Workpapers: WP-II-5 W&S, WP-II-6 W&S, WP-II-7 (a)&(b) and WP-II-P Affiliate Overhead, for Account 875.9 – Other. Please provide information about the referenced office move. Specifically, provide a narrative description of the move and what physical locations were involved. Further, indicate if this is a one-time project that will serve the UT or UTE and its customers over multiple years? Please indicate the specific line-items of expense that were associated with this project.

- 2-13.** Please reference Confidential Workpapers: WP-II-5 W&S, WP-II-6 W&S, WP-II-7 (a)&(b) and WP-II-P Affiliate Overhead, for Account 403.3 – Depreciation Expense. Please provide the Fixed Asset listing for Test Year end that is associated with the requested depreciation expense. Please include a description of the fixed asset, the original cost of the asset, the date placed in service, the assumed service life, and the current accumulated depreciation balance.

- 2-14.** Please reference Confidential Workpapers: WP-II-5 W&S, WP-II-6 W&S, WP-II-7 (a)&(b) and WP-II-P Affiliate Overhead, for Account 403.3 – Amortization Expense. Please provide a listing of the “other utility plant” that is being amortized.

March 31, 2020

Respectfully submitted,

Lori Cobos
Chief Executive & Public Counsel
State Bar No. 24042276

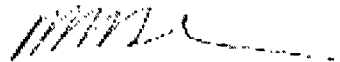


Chris Ekoh
Senior Managing Public Counsel
State Bar No. 06507015

OFFICE OF PUBLIC UTILITY COUNSEL
1701 N. Congress Avenue, Suite 9-180
P.O. Box 12397
Austin, Texas 78711-2397
512/936-7500 (Telephone)
512/936-7525 (Facsimile)
chris.ekoh@opuc.texas.gov
opuc_eservice@opuc.texas.gov (Service)

CERTIFICATE OF SERVICE

I hereby certify that a copy of the foregoing document was served on all parties of record in this proceeding on this 31st day of March 2020, by facsimile, electronic mail, and/or first class, U.S. Mail.



Chris Ekoh