

Control Number: 50200



Item Number: 1986

Addendum StartPage: 0

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



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


**UNDINE TEXAS, LLC AND UNDINE TEXAS ENVIRONMENTAL, LLC'S RESPONSE
TO COMMISSION STAFF'S FIFTH REQUEST FOR INFORMATION**

Undine Texas, LLC and Undine Texas Environmental, LLC (together, Undine) file this Response to the Fifth Request for Information (RFI) filed by the Staff of the Public Utility Commission of Texas (Staff). The discovery request was received by Undine on May 6, 2020; therefore these responses are timely filed. Pursuant to 16 Tex. Admin. Code (TAC) § 22.144(c)(2)(F), these responses may be treated as if they were filed under oath.

Respectfully submitted,

**LLOYD GOSSELINK ROCHELLE
& TOWNSEND, P.C.**

816 Congress Avenue, Suite 1900
Austin, Texas 78701
(512) 322-5800
(512) 472-0532 (Fax)
gcrump@lglawfirm.com
jmauldin@lglawfirm.com



GEORGIA N. CRUMP
State Bar No. 05185500

JAMIE L. MAULDIN
State Bar No. 24065694

ATTORNEYS FOR UNDINE TEXAS, LLC AND
UNDINE TEXAS ENVIRONMENTAL, LLC

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 May 19, 2020, in accordance with the Order Suspending Rules, issued in Project No. 50664.



GEORGIA N. CRUMP

SOAH DOCKET NO. 473-20-3110.WS

DOCKET NO. 50200

**UNDINE TEXAS, LLC AND UNDINE TEXAS ENVIRONMENTAL, LLC'S RESPONSE
TO COMMISSION STAFF'S FIFTH REQUEST FOR INFORMATION**

Staff 5-1 Please admit or deny that municipal franchise fees are included in either the water or sewer revenue requirement (or both). If admitted, please provide the amount of municipal franchise fees included and documentation supporting the amount.

RESPONSE: Deny. Undine Texas, LLC and Undine Texas Environmental, LLC are not required to pay municipal franchise fees. Therefore, none are included in this rate application.

Prepared by: Benny Wilkinson
Sponsored by: Edward R. Wallace, Sr.

SOAH DOCKET NO. 473-20-3110.WS

DOCKET NO. 50200

**UNDINE TEXAS, LLC AND UNDINE TEXAS ENVIRONMENTAL, LLC'S RESPONSE
TO COMMISSION STAFF'S FIFTH REQUEST FOR INFORMATION**

Staff 5-2 For cellular phone expenses of \$32,480.06, please provide the following:

- i. A copy of UT or UTE's policy, rules, and guidelines in providing company paid cellphones and monthly fees to officers and employees.
- ii. If no formal policy exists, a written description of how the decision is made to provide an employee with a company paid cell phone.
- iii. A list of officers and employees who were provided a company paid cellphone during the test year.
- iv. A breakdown of the cellular phone expenses of \$32,480.06.

RESPONSE:

i. Neither UT nor UTE have employees, therefore no employee policies are maintained. Undine Operating, LLC does not maintain a set of written policies, rules, or guidelines regarding the provision of cellphones or the payment of monthly fees for officers and employees.

ii. Undine Operating, LLC provides cellphones and pays for the monthly service billing for its employees. Employees are expected to be on-call at all times and all days of the week to respond to both internal (other employees) and external (customers, contractors, etc.) calls, customer service requests, and maintenance tasks among other daily duties. Cellphone use and communication are essential tools in the daily operations and management of both UT and UTE. Undine Operating, LLC also provides operations personnel with Tablets so that they can perform several of their required duties more efficiently and effectively. These duties include but are not limited to entering purchase orders and work orders into eMaint, the Work Order System utilized by Undine, assisting in obtaining meter readings, and email communication to coordinate with both internal and external parties for daily operations and maintenance tasks.

iii. Please refer to Attachment Staff 5-2 for a list of officers and employees provided cellphones, iPads, and/or Tablets during the Test Year.

iv. Please refer to Attachment Staff 5-2 for a detail of charges for cellphones, iPads, and Tablets provided to officers and employees and Operations personnel during the Test Year. The amount recorded to Account 806, Cellular Phones, for the Test Year was \$32,480.06.

Prepared by: Benny Wilkinson

Sponsored by: Edward R. Wallace, Sr.

Undine Operating, LLC
Detail of Cell Phone and Other Devices Charges
For the Test Year

<u>Cell Phones</u>				<u>Usage and</u>	<u>Equipment</u>	<u>Surcharges & Other</u>	<u>Taxes, Governmental</u>	<u>Total</u>
<u>Device Number</u>	<u>Name</u>	<u>Device Type</u>	<u>Monthly Charges</u>	<u>Purchase Charges</u>	<u>Charges</u>	<u>Charges & Credits</u>	<u>Surcharges & Fees</u>	<u>Charges</u>
Account Plan and Charges		SMB Unl Talk & Text; 80 GB	\$ 6,120.00	\$ -	\$ -	\$ -	\$ -	\$ 6,120.00
281-387-8158	Charles Leibold	Cellphone	596.00	10.00	581.69	39.31	49.89	1,276.89
281-450-7499	Benny Wilkinson	Cellphone	536.00	-	-	36.40	66.49	638.89
281-723-5033	Cory Pendleton	Cellphone	521.00	-	-	35.89	64.89	621.78
281-731-7146	Kelley Wallace	iPad	363.00	-	-	2.92	40.12	406.04
281-744-7510	Edward Wallace	Cellphone	656.00	58.14	-	43.47	77.91	835.52
281-924-1821	Kevin Binder	Cellphone	405.00	-	32.74	35.89	63.10	536.73
303-589-2301	Katie Ransbottom	Cellphone	536.00	150.00	(100.00)	46.14	79.03	711.17
346-266-7462	Operations	Tablet	95.00	-	-	1.20	17.75	113.95
346-267-3567	Operations	Tablet	253.33	-	-	10.37	20.09	283.79
346-267-3570	Operations	Tablet	221.67	-	-	1.13	15.49	238.29
346-267-3603	Operations	Tablet	536.00	-	-	36.40	66.99	639.39
713-703-5208	Nicia Rotermund	Lost iPad-removed	120.00	35.00	-	4.31	34.77	194.08
713-724-4441	Cory Pendleton	Smart Watch-Service Only	236.00	-	-	26.23	41.79	304.02
713-724-9321	Jeff Goebel	Cellphone	676.00	179.10	-	75.01	87.60	1,017.71
713-732-9100	Eric Griffin	Cellphone	536.00	10.00	-	37.05	67.81	650.86
713-805-7015	Carey Thomas	Cellphone	514.50	68.28	589.63	42.38	70.82	1,285.61
713-819-8416	William Thomas	Cellphone	536.00	21.99	-	37.86	70.80	666.65
832-506-5573	Edward Wallace	iPad	363.00	-	-	2.92	40.12	406.04
832-776-0349	Rick Melcher	Old Aircard-removed	63.66	-	-	1.74	17.19	82.59
907-385-4741	Nicia Rotermund	Cellphone	536.00	-	-	36.40	66.99	639.39
979-224-2334	Mike Ashfield	Cellphone	596.00	110.00	-	45.21	80.41	831.62
979-229-9939	Rickey Wallace	Cellphone	536.00	-	883.34	35.95	65.93	1,521.22
979-319-0966	Rick Melcher	Cellphone	586.00	23.88	411.32	40.40	72.64	1,134.24
832-712-5607	Darrell Faykus	Cellphone (business)	303.71	-	448.54	27.24	47.00	826.49
832-349-4256	Sarah Carlock	Cellphone	270.97	-	-	22.74	37.73	331.44
512-999-0960	Darrell Faykus *	Cellphone (personal)	886.72	-	-	-	-	886.72
SUB-TOTAL			\$ 17,599.56	\$ 666.39	\$ 2,847.26	\$ 724.56	\$ 1,363.35	\$ 23,201.12

* To reimburse employee for using his personal cellphone for 16 months of business use.

Undine Operating, LLC
Detail of Cell Phone and Other Devices Charges
For the Test Year

<u>Tablets</u>			<u>Usage and</u>	<u>Equipment</u>	<u>Surcharges & Other</u>	<u>Taxes, Governmental</u>	<u>Total</u>	
<u>Device Number</u>	<u>Name</u>	<u>Device Type</u>	<u>Monthly Charges</u>	<u>Purchase Charges</u>	<u>Charges</u>	<u>Charges & Credits</u>	<u>Surcharges & Fees</u>	<u>Charges</u>
Account Plan and Charges		SMB Unl Talk & Text; 80 GB	\$ 5,610.00	\$ -	\$ -	\$ -	\$ -	\$ 5,610.00
281-627-1713	Operations	Tablet	171.00	-	-	2.27	16.17	189.44
281-627-1820	Operations	Tablet	171.00	-	-	2.27	40.43	213.70
346-266-7458	Operations	Tablet	166.00	-	-	23.39	62.74	252.13
346-266-7459	Operations	Tablet	171.00	-	-	2.27	37.83	211.10
346-266-7460	Operations	Tablet	171.00	-	-	2.27	37.83	211.10
346-266-7461	Operations	Tablet	171.00	-	-	2.27	37.83	211.10
346-267-3564	Operations	Tablet	171.00	-	-	2.27	37.83	211.10
346-267-3565	Operations	Tablet	171.00	-	-	2.27	37.83	211.10
346-267-3566	Operations	Tablet	171.00	-	-	2.27	37.83	211.10
346-267-3568	Operations	Tablet	171.00	-	-	2.27	37.83	211.10
346-267-3569	Operations	Tablet	171.00	-	-	2.27	37.83	211.10
346-267-3571	Operations	Tablet	171.00	-	-	2.27	37.83	211.10
346-267-3572	Operations	Tablet	171.00	-	-	2.27	37.83	211.10
346-267-3573	Operations	Tablet	171.00	-	-	2.27	37.83	211.10
346-267-3574	Operations	Tablet	171.00	-	-	2.27	37.83	211.10
346-266-7462	Operations	Tablet	76.00	-	-	0.82	14.95	91.77
346-267-3567	Operations	Tablet	185.67	-	-	5.99	14.17	205.83
346-267-3570	Operations	Tablet	169.33	-	-	0.74	12.80	182.87
SUB-TOTAL			\$ 8,601.00	\$ -	\$ -	\$ 62.72	\$ 615.22	\$ 9,278.94
TOTAL ACCOUNT 806 - CELLPHONES								\$ 32,480.06
Personal Expense to be Excluded:								
281-731-7146	Kelley Wallace	iPad	363.00	-	-	2.92	40.12	406.04
TOTAL ACCOUNT 806 - CELLPHONES - As Adjusted								\$ 32,074.02