



Control Number: 50424



Item Number: 16

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DOCKET NO. 50424

**APPLICATION OF MONARCH
UTILITIES 1, L.P. AND GOINS
UTILITY SERVICE LLC FOR SALE,
TRANSFER, OR MERGER OF
FACILITIES AND UNCERTIFICATED
AREA OF POLK COUNTY**

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**PUBLIC UTILITY COMMISSION
OF TEXAS**



**COMMISSION STAFF'S FIRST REQUEST FOR INFORMATION
TO GOINS UTILITY SERVICE LLC
QUESTION NOS. STAFF 1-1 THROUGH STAFF 1-13**

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 Goins Utility Service LLC (Goins) by and through their 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 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 Order Suspending Rules in Docket No. 50664.

ILC

Dated: June 25, 2020

Respectfully submitted,

**PUBLIC UTILITY COMMISSION OF TEXAS
LEGAL DIVISION**

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Division Director

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/s/ Taylor P. Denison
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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 June 25, 2020, in accordance with the Order Suspending Rules, issued in Project No. 50664.

/s/ Taylor P. Denison
Taylor P. Denison

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**COMMISSION STAFF'S FIRST REQUEST FOR INFORMATION
TO GOINS UTILITY SERVICE LLC
QUESTION NOS. STAFF 1-1 THROUGH STAFF 1-13**

DEFINITIONS

- 1) "Goins" or "you" refers to Goins Utility Service 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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**COMMISSION STAFF'S FIRST REQUEST FOR INFORMATION
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QUESTION NOS. STAFF 1-1 THROUGH STAFF 1-13**

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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**COMMISSION STAFF'S FIRST REQUEST FOR INFORMATION
TO GOINS UTILITY SERVICE LLC
QUESTION NOS. STAFF 1-1 THROUGH STAFF 1-13**

- Staff 1-1 Please provide Goins Utility Service LLC's (Goins) tax returns and supporting detailed schedules that include income, expenses, and asset depreciation related to providing water and sewer service for the most recent three years.
- Staff 1-2 Please provide Goins' historical income statements and balance sheets for water service operations for the last three years or a completed Appendix A of the application.
- Staff 1-3 Please provide Goins' historical income statements and balance sheets for sewer service operations for the last three years or a completed Appendix A of the application,
- Staff 1-4 Please provide an electronic Microsoft Excel copy of Goins' general ledger supporting the most recent historical balance sheet and income statement for water service operations. If a Microsoft Excel version is unavailable, provide a .pdf copy.
- Staff 1-5 Please provide an electronic Microsoft Excel copy of Goins' general ledger supporting the most recent historical income statement and balance sheet for sewer service operations. If a Microsoft Excel version is unavailable, provide a .pdf copy.
- Staff 1-6 Please provide a copy of all invoices for Goins to provide water service for the most recent year's financial statements.
- Staff 1-7 Please provide a copy of all invoices for Goins to provide sewer service for the most recent year's financial statements.
- Staff 1-8 Please provide any other revenue amounts including tap fees, late fees, transfer fees, reconnect fee or returned check charges for the water system for the most current financial statements provided.
- Staff 1-9 Please provide any other revenue amounts including tap fees, late fees, transfer fees, reconnect fee or returned check charges for the sewer system for the most current financial statements provided.

- Staff 1-10 For loans outstanding at the end of the most current financial statement period related to water assets or operations, please provide:
- a. A copy of each loan or credit agreement;
 - b. An amortization schedule for monthly payments for each agreement;
 - c. The outstanding balance;
 - d. The interest rate.
- Staff 1-11 For loans outstanding at the end of the most current financial statement period related to sewer assets or operations, please provide:
- a. A copy of each loan or credit agreement;
 - b. An amortization schedule for monthly payments for each agreement;
 - c. The outstanding balance;
 - d. The interest rate.
- Staff 1-12 Please provide water usage per connection for the most recent year.
- Staff 1-13 Please provide sewer usage per connection for the most recent year.