

LIFE ANALYSIS

Working with field personnel and using judgment as a professional engineer, individual assets were reviewed and assigned a life based on its description and usage.

The listing below shows the broad categories by item and the proposed life in this depreciation study.

5-year life

Chemical Pumps
Drum Pumps
Computer Hardware

7-Year life

Computer Software

10-year life

Air Compressors
Auto dialers
Electronic Equipment that contain software or chips
Data Loggers
Flow Meters
Heaters
Galvanized Pipe (in wells)
Reverse Osmosis ("RO") Membranes
Security System
Transducers
Water Pumps less than 15 HP and well pumps

15-year life

Chlorination Systems
Filters and Media
Large Power Operated Equipment
Office Furniture and Equipment
Small Valves (water distribution)
Small Tanks
Trailers

20-year life

Asphalt Drives and Parking Lots
Catwalks and Minor Structures
Communication Equipment such as Supervisory Control and Data Acquisition
("SCADA")
Condensers
Furniture
Generators - Small
HVAC
Meters
Roof
Transmitters
Valves - Small (other than water distribution)
Variable Frequency Drives ("VFD")

25-year life

Grinder Pumps
Sewer Pumps

30-Year life

Booster Pump Stations (Complete)
Buoys
Concrete Drives and Parking Lots
Electrical Equipment
Fencing
Lighting
Large Generators
Pressurized Tanks
Pumps 15HP or greater
Small Buildings and Wood Structures

40-Year life

Blowers
RO Plants

50-year life

Clarifiers
Concrete Structures
Intake Structures

Large Water Valves (4" and above)
Lift Stations (Complete)
Manholes
Masonry Structures
Office Buildings
Reservoirs (non-pressurized tanks)
Wells
Wastewater Infrastructure

65-year life

Galvanized Pipe (not in wells)
Hydrants
Services (Water and Wastewater)
Service taps (Water and Wastewater) and boxes
Wastewater Plant Piping

85-year life

Ponds
Water and Wastewater mains and collection sewers

ACCOUNT SPECIFIC INFORMATION

LIFE ANALYSIS

Monarch historically has used an item-based approach to depreciating assets. This study uses the same approach. A comparison between the existing life and the recommended life for each item is shown in the workpapers.

WATER PLANT

Accounts 303 – Land

This account consists of fee land associated with water operations. Investment in this account is non-depreciable. Thus, no life recommendation is made for this account.

Account 303- Land Rights

This account consists of land rights, interconnection rights, and capacity agreements associated with water operations. There is a small amount of plant in service, \$687 thousand. Current asset lives range from 9 years (for a capacity agreement) to 85 years for an item associate with mains. The lives for most individual assets remained the same, with some items being given a slightly longer life. Proposed lives of assets in this account range from 9 to 85 years. The average life of the account under current lives is 19.52 years, and the average life of the account under proposed lives is 19.57 years.

Account 304 Structures & Improvements

This account consists of five separate types of assets related to pumping, water treatment, administrative and general functions and fencing. Pumping Equipment consists of water booster station buildings, storage sheds, and miscellaneous equipment buildings that are used in connection with source of supply and pumping facilities. Water treatment plant consists of the Oak Trail

Shores' reverse osmosis plant, water treatment plant, pump stations, various wood, steel, aluminum, metal, concrete and plastic structures, and buildings and various other improvements used in connection with water treatment facilities. General and administrative structures and improvements include as chemical containment building, laboratory, yard paving, fences, lot resurfacing, and other miscellaneous improvements and related equipment. Finally, this account also includes fences and other related assets. The balance in this account is \$16.1 million. A small amount of plant is classified as shared assets. The current lives for assets in this account range from 10 years to 85 years. Proposed lives range from 5 years to 85 years. The average life of the account under current lives is 29.04 years, and the average life of the account under proposed lives is 37.54 years.

Account 306 Lake River and Other Intakes

This account consists of costs of lake, river, and other intakes used as a source of water supply. Some items in this account include intake structures, barges, and buoys for wells, pumps, intake structures, and various other assets related to the various well sites. The asset balance is \$346 thousand for this account. Current lives of assets in this account range from 15 to 50 years. Proposed lives of assets in this account also range from 15 to 50 years. The average life of the account under current lives is 49.09 years, and the average life of the account under proposed rates is 46.52 years.

Account 307 Wells and Springs

This account consists of costs for wells, pumps, intake structures, and various other assets related to the various well sites. Items in this account consist of assets such as wells, casing, and appurtenances as well as collecting basins, pipes, fences, and landscaping related to wells and springs. The asset balance is \$18.5 million for this account. Current lives of assets in this account range from 10 to 85 years. Proposed lives of assets in this account range from 5

to 85 years. The average life of the account under current lives is 44.70 years, and the average life of the account under proposed lives is 49.33 years.

Account 310 Electrical Equipment

This account consists of electrical equipment, controls, control boxes, and other equipment. The account balance is \$6.8 million. Current lives of assets in this account range from 10 to 85 years. Proposed lives of assets in this account range from 10 to 85 years. The average life of the account under current lives is 17.63 years, and the average life of the account under proposed lives is 29.38 years.

Account 311 Pumping Equipment

This account consists of any equipment used for control or operation of used in pumping or treatment operations driven by electricity, diesel engines, steam engines or water wheels, and turbines. This account contains a wide variety of assets from booster pumps and motors to pipe and electrical work. The asset balance is \$13.7 million for this account. Current lives of assets in this account range from 1 to 85 years. Proposed lives of assets in this account range from 10 to 65 years. The average life of the account under current lives is 15.38 years, and the average life of the account under proposed lives is 23.39 years.

Account 320 Water Treatment Equipment

This account consists of clarifiers, reverse osmosis (RO) units, filters, chemical pumps, chlorinators, and other equipment used in the water treatment facilities. The asset balance is \$6.8 million for this account. Current lives of assets in this account range from 5 to 85 years. Proposed lives of assets in this account range from 5 to 50 years. The average life of the account under current lives is 17.88 years, and the average life of the account under proposed lives is 46.08 years.

Account 330 Distribution Reservoirs and Standpipes

This account consists of elevated storage, ground storage tanks, standpipes, hydro tanks, and appurtenances used in storing and distribution of water. The asset balance is \$19.0 million for this account. Current lives of assets in this account range from 7 to 85 years. Proposed lives of assets in this account range from 10 to 85 years. The average life of the account under current lives is 49.57 years, and the average life of the account under proposed lives is 37.59 years.

Accounts 331 Mains

This account consists of distribution lines and mains of varying types and sizes, valves, fittings, and other related equipment. The total balance for this account is \$57.2 million. Current lives of assets in this account range from 7 to 85 years. Proposed lives of assets in this account range from 10 to 85 years. The average life of the account under current lives is 78.32 years, and the average life of the account under proposed lives is 83.69 years.

Account 333 Services

This account consists of service pipes, taps, meter boxes, and accessories leading from the main to the customers' premises. The asset balance is \$798 thousand for this account. The current lives of assets in this account range from 10 to 85 years. Proposed lives of assets in this account range from 15 to 85 years. The average life of the account under current lives is 33.34 years, and the average life of the account under proposed lives is 64.51 years.

Account 334 Meters

This account consists of meters, devices, and other appurtenances used for measuring the quantity of water delivered to users, including meters used at production facilities. The asset balance is \$7.2 million for this account. Current

lives of assets in this account range from 3 to 85 years. Proposed lives of assets in this account range from 15 to 65 years. The average life of the account under current lives is 20.43 years, and the average life of the account under proposed lives is 20.38 years.

Account 335 Hydrants

This account consists of hydrants in service owned by the utility. The asset balance is \$551 thousand for this account. Current lives of assets in this account range from 10 to 50 years. Proposed lives of assets in this account range from 15 to 65 years. The average life of the account under current lives is 46.27 years, and the average life of the account under proposed lives is 64.54 years.

Account 339 Other Plant and Equipment

This account consists of assets not classified in other accounts. This account includes water maps and related assets. The asset balance is \$4.1 thousand for this account. The current and proposed life of this account is 20 years. The average life of the account under current and proposed lives is 20 years.

Account 340 Office Furniture & Equipment

This account includes furniture and equipment such as: fax machines, copiers, file cabinets, and other miscellaneous office equipment. Computer peripherals consist of computers, laptops, printers, and other related equipment. The asset balance is \$1.5 million for this account. Component lives are assigned to match the characteristics of each asset. Current lives of assets in this account range from 1 to 35 years. Proposed lives of assets in this account range from 5 to 50 years. The average life of the account under current lives is 6.95 years, and the average life of the account under proposed lives is 7.27 years.

Account 341 Transportation Equipment

This account consists of various kinds of motor vehicles licensed for use on roadways. Such assets might include cars, trucks, heavy trucks, trailers, and flatbeds. The asset balance is \$3.5 million for this account. Current lives of assets in this account range from 7 to 15 years. Proposed lives of assets in this account also range from 7 to 15 years. The average life of the account under current lives is 5.28 years, and the average life of the account under proposed lives is 7.45 years.

Account 343 Tools, Shop & Garage Equipment

This account consists of tools, shop equipment, and garage equipment. The asset balance is \$509 thousand for this account. Current lives of assets in this account range from 3 to 50 years. Proposed lives of assets in this account range from 10 to 20 years. The average life of the account under current lives is 14.94 years, and the average life of the account under proposed lives is 15.23 years.

Account 344 Laboratory Equipment

This account consists of laboratory equipment such as water monitoring equipment, turbidity meters, leak detectors, computer spectrometer, and other devices. The asset balance is \$137 thousand for this account. Current lives of assets in this account range from 10 to 35 years. Proposed lives of assets in this account range from 10 to 20 years. The average life of the account under current lives is 15.85 years, and the average life of the account under proposed lives is 15.23 years.

Account 345 Power Operated Equipment

This account consists of power operated equipment such as generators, compressors, and other equipment. The asset balance is \$457 thousand for this account. Current lives of assets in this account range from 10 to 15 years. The

proposed life for all assets in this account is 15 years. The average life of the account under current lives is 13.35 years, and the average life of the account under proposed lives is 15.00 years.

Account 346 Communication Equipment

This account consists of SCADA, telephones, mobile radios, and other miscellaneous communication equipment. The asset balance is \$1.2 million for this account. Current lives of assets in this account range from 5 to 85 years. Proposed lives of assets in this account range from 10 to 20 years. The average life of the account under current lives is 16.89 years, and the average life of the account under proposed lives is 18.11 years.

Account 347 Miscellaneous Equipment

This account consists of SCADA, telephones, and mobile radios and other miscellaneous communication equipment. The asset balance is \$68 thousand. The current life and proposed life of assets in this account is 15 years. The average life of the account under both current and proposed lives is 15.00 years.

WASTEWATER PLANT**Account 352 – Franchises**

This account consists of wastewater franchises. The current life is 33 years. The average life of the account using current lives is 33 years, and the life of the account under proposed lives is 30 years.

Account 353 – Wastewater Land

This account consists of fee land associated with wastewater operations. Investment in this account is non-depreciable. Thus no life recommendation is made for this account.

Account 354 - Wastewater Structures & Improvements

This account consisted of 3 different general types of assets related to lift stations, treatment plant operations, and general collection operations. Lift stations consist of buildings and related structures or improvements used in connection with collection system lift stations. Water treatment buildings consist of buildings, storage sheds, and other related structures or improvements used in connection with treatment plant operations. Other structures are office, lab, and storage buildings and other related structures or improvements used in connection with collection or treatment operations. The asset balance is \$4.0 million for this account. Current lives of assets in this account range from 15 to 85 years. Proposed lives of assets in this account range from 10 to 85 years. The average life of the account under current lives is 30.42 years, and the average life of the account under proposed lives is 42.40 years.

Account 355 Wastewater Structures & Improvements

This account consists of office, lab, and storage buildings and other related structures or improvements used in connection with collection or treatment operations. The asset balance is \$78 thousand for this account. Current lives of assets in this account range from 5 to 35 years. Proposed lives

of assets in this account range from 10 to 30 years. The average life of the account under current lives is 25.39 years, and the average life of the account under proposed lives is 29.55 years.

Account 360 Wastewater Collecting Sewers – Lines

This account consists of sewers lines and related appurtenances used to move sewage under pressure (force mains). Also included are pumps, motors, valves, piping, and other equipment used to lift sewage. The asset balance is \$3.4 million for this account. Current lives of assets in this account range from 15 to 65 years. Proposed lives of assets in this account range from 15 to 65 years. The average life of the account under current lives is 65.00 years, and the average life of the account under proposed lives is 64.95 years.

Account 361 Wastewater Collecting Sewers - Gravity

This account consists of gravity collecting sewers, interceptor, branch, trunk, and laterals. The asset balance is 4.3 million for this account. Current lives of assets in this account range from 15 to 85 years. Proposed lives of assets in this account range from 15 to 85 years. The average life of the account under current lives is 64.46 years, and the average life of the account under proposed lives is 84.62 years.

Account 363 Wastewater Service Connections

This account includes service connections and laterals associated with wastewater plant. The balance in this account is \$61 thousand. Current lives of assets in this account range from 15 to 25 years. The proposed life of this account is 65 years. The average life of the account under current lives is 60.32 years, and the average life of the account under proposed lives is 65.00 years.

Account 364 Wastewater Flow Measurement- Wastewater Plants

This account consists of flow metering devices and related equipment.

The asset balance is \$59 thousand for this account. Current lives of assets in this account range from 15 to 25 years. The proposed life of assets in this account is 10 years. The average life of the account under current lives is 24.01 years, and the average life of the account under proposed lives is 10.00 years.

Account 367 Wastewater Reuse

This account consists of the costs associated with customer service lines. The asset balance is \$12 thousand for this account. The current life of assets in this account is 25 years. The proposed life of assets in this account is 30 years. The average life of the account under current rates is 25.00 years, and the average life of the account under proposed rates is 30.00 years.

Account 370 Wastewater Receiving Wells and Manholes

This account consists primarily of manholes and related gravity lines at junction points along the collecting system. The asset balance is \$1.4 million for this account. Current lives of assets in this account range from 5 to 50 years. Proposed lives of assets in this account range from 15 to 65 years. The average life of the account under current lives is 48.52 years, and the average life of the account under proposed lives is 49.36 years.

Account 371.1 Wastewater Lift Stations - Pumps

This account consists of equipment for control and operation of electrically operated equipment at lift stations and plant sites. The account balance is \$1.8 million for this account. Current lives of assets in this account range from 15 to 65 years. Proposed lives of assets in this account range from 10 to 65 years. The average life of the account under current lives is 31.34 years, and the average life of the account under proposed lives is 29.69 years.

Account 371.2 Wastewater Pumping Equipment- Services

This account consists of replacement on-site pumps and related assets.

The account balance is 1.3 million for this account. The existing life is 25 years. Current lives of assets in this account range from 15 to 85 years. Proposed lives of assets in this account range from 20 to 40 years. The average life of the account under current lives is 25.07 years, and the average life of the account under proposed lives is 25.29 years.

Account 380 Wastewater Treatment & Disposal Equipment

This account consists of wastewater treatment plants and equipment used for the treatment of wastewater and disposal of sewage wastes. Such items include assets used for disinfection, blowers, unit internals, filter media, and related controls. The asset balance is \$3.7 million for this account. Current lives of assets in this account range from 5 to 65 years. Proposed lives of assets in this account range from 5 to 65 years. The average life of the account under current lives is 25.67 years, and the average life of the account under proposed lives is 36.08 years.

Account 382 Wastewater Plant and Outfall Lines

This account consists of any part of a sewer line carrying effluent from a treatment facility to the point of discharge. The asset balance is \$273 thousand for this account. The average life of the account under current rates is 19.52 years, and the average life of the account under proposed rates is 19.52 years. Current lives of assets in this account range from 35 to 65 years. The proposed life of assets in this account is 65 years. The average life of the account under current lives is 35.94 years, and the average life of the account under proposed lives is 65.00 years.

Account 390 Wastewater Furniture & Fixtures

This account consists of various furniture and equipment. The asset balance is \$117 thousand for this account. Current lives of assets in this account range from 2 to 15 years. Proposed lives of assets in this account range from 10

to 15 years. The average life of the account under current lives is 14.02 years, and the average life of the account under proposed lives is 14.89 years.

Account 393.00 Wastewater Tools, Shop & Garage Equipment

This account consists of tools, shop equipment, and garage equipment such as air compressors and other tools. The asset balance is \$4 thousand for this account. Current lives of assets in this account range from 5 to 15 years. The life of proposed life of assets in this account is 15 years. The average life of the account under current lives is 14.61 years, and the average life of the account under proposed lives is 15.00 years.

Account 394 Wastewater Laboratory Equipment

This account consists of laboratory equipment such as water monitoring equipment, turbidity meters, leak detectors, computer spectrometer, and other devices. The asset balance is \$4 thousand for this account. Current lives of assets in this account range from 15 to 25 years. The proposed life of assets in this account is 15 years. The average life of the account under current lives is 20.01 years, and the average life of the account under proposed lives is 15.00 years.

Account 395 Wastewater Power Operated Equipment

This account consists of power operated equipment such as service truckers, trailers, and mowers. The asset balance is \$248 thousand for this account. Current lives of assets in this account range from 4 to 25 years. Proposed lives of assets in this account range from 4 to 30 years. The average life of the account under current lives is 12.42 years, and the average life of the account under proposed lives is 12.99 years.

Account 396 Wastewater Communication Equipment

This account consists of SCADA, radios, auto-dialers, modems, and other

miscellaneous communication equipment. The asset balance is \$60 thousand for this account. Current lives of assets in this account range from 20 to 25 years. With the current changes in technology, communication equipment is lasting a shorter period of time than currently used for this account. The proposed life for assets in this account is 10 years. The average life of the account under current lives is 20.10 years, and the average life of the account under proposed lives is 10.00 years.

APPENDIX A
Summary of Current versus Proposed Depreciation Expense

**MONARCH UTILITIES
SUMMARY OF CURRENT AND PROPOSED DEPRECIATION EXPENSE
AT DECEMBER 31, 2019**

Asset Group	Account	Account Description	Plant at 12/31/2019	Expense at Current Rates	Expense at Proposed Rate	Difference
Water	303	Land	2,139,986.79	0.00	0.00	0.00
Water	304	Structures and Improvements	16,018,169.54	494,883.37	404,663.52	(90,219.85)
Water	306	Lake, River and Other Intakes	346,351.11	7,224.98	7,923.50	698.52
Water	307	Wells and Springs	18,280,775.96	390,245.93	371,463.55	(18,782.38)
Water	310	Electrical Equipment	6,679,714.11	224,365.68	138,399.06	(85,966.62)
Water	311	Pumping Equipment	13,555,178.10	824,745.48	654,999.97	(169,745.51)
Water	320	Water Treatment Equipment	6,790,047.47	345,284.11	312,447.28	(32,836.83)
Water	330	Distribution Reservoirs and Standpipes	18,600,299.05	381,048.10	421,613.86	40,565.76
Water	331	Transmission and Distribution Mains	55,798,793.75	761,098.69	696,482.40	(64,616.29)
Water	333	Services	798,071.23	26,861.12	11,759.81	(15,101.31)
Water	334	Meters	7,146,960.35	354,554.55	354,086.19	(468.36)
Water	335	Hydrants	446,921.52	10,887.70	7,037.59	(3,850.11)
Water	339	Other Plant and Equipment	4,100.00	205.00	205.00	0.00
Water	340	Office Furniture and Equipment	466,015.25	15,231.24	16,940.95	1,709.71
Water	341	Transportation Equipment	223,270.88	4,253.97	3,178.30	(1,075.67)
Water	343	Tools Shop and Garage Equipment	451,659.51	5,248.36	8,475.61	3,227.24
Water	344	Laboratory Equipment	127,721.98	1,671.95	1,710.68	38.73
Water	345	Power Operated Equipment	46,210.32	0.00	0.00	0.00
Water	346	Communication Equipment	1,198,750.42	69,411.63	62,105.03	(7,306.60)
Water	347	Miscellaneous Equipmeent	68,067.62	4,313.60	4,313.60	0.00
Water	303D	Land Rights	686,871.12	36,532.87	36,520.05	(12.82)
		Total Water	149,873,936.08	3,958,068.35	3,514,325.96	(443,742.39)
Sewer	352	Franchises	14,998.76	454.51	499.96	45.45
Sewer	353	Land and Land Rights	31,351.41	0.00	0.00	0.00
Sewer	354	Structures and Improvements	6,558,211.03	206,224.14	163,723.63	(42,500.50)
Sewer	355	Electric Equipment	94,462.51	3,602.80	3,077.96	(524.84)
Sewer	360	Sewers Lines	3,393,235.54	52,216.80	52,364.89	148.09
Sewer	361	Sewers - Gravity	3,984,081.05	61,440.01	46,985.47	(14,454.54)
Sewer	363	Service Connections	61,349.66	1,072.74	943.84	(128.90)
Sewer	364	Flow Meters	158,905.92	6,757.80	15,890.59	9,132.80

MONARCH UTILITIES
SUMMARY OF CURRENT AND PROPOSED DEPRECIATION EXPENSE
AT DECEMBER 31, 2019

Table with columns: Asset Group, Account, Account Description, Plant at 12/31/2019, Expense at Current Rates, Expense at Proposed Rate, Difference. Rows include Sewer, Shared, and various equipment and infrastructure items.

MONARCH UTILITIES
SUMMARY OF CURRENT AND PROPOSED DEPRECIATION EXPENSE
AT DECEMBER 31, 2019

Asset Group	Account	Account Description	Plant at 12/31/2019	Expense at Current Rates	Expense at Proposed Rate	Difference
Shared	371.1	Lift Stations Pumps	673.82	19.25	26.95	7.70
Shared	390	Office Furniture and Equipment	104,685.81	6,636.38	6,636.38	0.00
Shared	395	Power Operated Equipment	125,754.62	5,885.85	5,885.85	0.00
		Total Shared	7,963,825.46	731,890.62	585,350.72	(146,539.90)
		Total Monarch	180,921,553.25	5,303,199.07	4,646,717.59	(656,481.48)

APPENDIX B
Detailed Computation of Annual Current and
Proposed Computation of Annual Depreciation Expense

Voluminous – provided in electronic form

PUC DOCKET NO. 50994

APPLICATION OF MONARCH	§	PUBLIC UTILITY COMMISSION
UTILITIES I L.P. FOR AUTHORITY TO	§	
CHANGE RATES	§	OF TEXAS

DIRECT TESTIMONY
OF
LAMBETH TOWNSEND

ON BEHALF OF
MONARCH UTILITIES I L.P.

JULY 15, 2020

**DIRECT TESTIMONY OF
LAMBETH TOWNSEND**

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ATTACHMENTS

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Attachment RLT-2	Rate Case Expense Summary Sheet
Attachment RLT-3	Lloyd Gosselink Rochelle & Townsend, P.C. Invoices
Attachment RLT-4	Alliance Consulting Group Invoices
Attachment RLT-5	FINCAP, Inc. Invoice

PUC DOCKET NO. 50994

**APPLICATION OF MONARCH
UTILITIES I L.P. FOR AUTHORITY TO
CHANGE RATES**

**§
§
§**

**PUBLIC UTILITY COMMISSION
OF TEXAS**

**DIRECT TESTIMONY OF
LAMBETH TOWNSEND**

I. INTRODUCTION

1

2 **Q. PLEASE STATE YOUR NAME AND ADDRESS.**

3 A. My name is Lambeth Townsend. I am an attorney and a principal at the law firm of
4 Lloyd Gosselink Rochelle & Townsend, P.C. (“Lloyd Gosselink”), which has its
5 principal place of business located at 816 Congress Ave., Suite 1900, Austin, TX
6 78701.

7 **Q. ON WHOSE BEHALF ARE YOU TESTIFYING IN THIS PROCEEDING?**

8 A. I am filing direct testimony on behalf of Monarch Utilities I L.P. (“Monarch”), which
9 filed the Application to Change Rates for Water and Sewer Service (“Rate
10 Application” or “Rate Filing Package” (“RFP”)) with the Public Utility Commission
11 of Texas (“Commission”) in this case.

12 **Q. PLEASE SUMMARIZE YOUR PROFESSIONAL AND EDUCATIONAL
13 BACKGROUND.**

14 A. I have been licensed to practice law in Texas since 1975. I was legal counsel to the
15 Local and Consent Calendar Committee, Texas House of Representatives in 1975 and
16 1976. I served as an Assistant Attorney General for the State of Texas from 1977 to
17 1984, where my practice focused on defending state agency orders and representing
18 the agencies in litigation. I was in private practice from 1984 to 1987. From 1987 to
19 1989, I served as the General Counsel for the Commission. I returned to private
20 practice in 1989 and have been focusing my practice on electric, water, and gas utility

1 law and litigation. I am Board Certified in Administrative Law by the Texas Board of
2 Legal Specialization. I have represented regulatory agencies, utilities, and consumers
3 in numerous rate proceedings in my 45 years of experience as an attorney. A copy of
4 my biography is attached to my testimony as Attachment RLT-1.

5 II. PURPOSE AND SCOPE

6 Q. WHAT IS THE PURPOSE AND SCOPE OF YOUR TESTIMONY IN THIS 7 PROCEEDING?

8 A. The purpose of my testimony is to present expert opinion testimony concerning the
9 reasonableness of the rate case expenses incurred by Monarch in preparing and
10 prosecuting its Rate Application.

11 Reimbursable rate case expenses were incurred by Monarch before the July
12 15, 2020 application was filed with the Commission, beginning in April 2019.
13 Monarch is requesting reimbursement of all reasonable rate case expenses. My
14 testimony supports the reasonableness of the legal and consultant expenses incurred
15 by Monarch regarding this Rate Application proceeding at the Commission. My
16 testimony also provides the legal support under which Monarch is seeking to recover
17 its non-legal and non-consultant rate case expenses, as supported by the Direct
18 Testimony of Brian Bahr. The direct testimony of Mr. Bahr explains how Monarch
19 proposes to recover rate case expenses, including information concerning all the
20 allocations of expenses by water and sewer functions, and sponsors Schedule II-E-4.5
21 as required under the Commission's Class A Investor-Owned Utilities Water and/or
22 Sewer Rate Filing Package for Cost of Service Determination.

23 Q. ARE YOU SPONSORING ANY SCHEDULES?

24 A. No.

1 **III. RECOMMENDATIONS**

2 **Q. WHAT ARE YOUR RECOMMENDATIONS?**

3 A. Based upon my review, I recommend that Monarch be allowed to recover the
4 reasonable and necessary legal and consultant rate case expenses of \$45,576.48 as of
5 May 31, 2020, plus the supplemental amount that will be provided at hearing.

6 **Q. PLEASE DESCRIBE THE PROCESS YOU UNDERTOOK TO REACH**
7 **YOUR CONCLUSION.**

8 A. Based on my experience and education, and following a thorough and critical review
9 of all of the relevant information, I concluded that the reasonable and necessary
10 Monarch rate case expenses for legal and consultant services as of May 31, 2020, is
11 \$45,576.48. A rate case expense summary sheet detailing each expense by attorney
12 and consultant is attached to my testimony as Attachment RLT-2. I recommend that
13 the Commission find this amount to be the reasonable and necessary reimbursable
14 legal and consultant rate case expenses for Monarch in this proceeding. I also
15 recommend that the Commission allow Monarch to recover its non-legal and
16 non-consultant rate case expenses described in the Direct Testimony of Brian Bahr,
17 pursuant to Texas Water Code Ann. §§ 13.183, 13.185(c), and 13.187, and 16 Texas
18 Administrative Code (“TAC”) § 24.33.

19 Monarch engaged the services of Lloyd Gosselink in April 2019. I have
20 directed the work performed by Lloyd Gosselink employees on behalf of Monarch
21 since that time. I have reviewed the billings of Lloyd Gosselink submitted to
22 Monarch for legal services from April 16, 2019, through May 31, 2020, in connection
23 with Monarch’s proposed rate increase. I affirm that those billings accurately reflect
24 the time spent and expenditures incurred by Lloyd Gosselink on Monarch’s behalf.
25 Those billings were accurately calculated before they were tendered and did not

1 include any double billing. None of the charges billed to Monarch have been
2 recovered through reimbursement for other expenses. The expenses charged were
3 associated with the review and prosecution of Monarch's rate application and were
4 necessary to advise Monarch and to accomplish tasks in the rate proceeding.

5 For the period April 16, 2019, through May 31, 2020, Lloyd Gosselink billed
6 \$23,843.98 for legal services in connection with Monarch's proposed rate increase.
7 This figure includes legal fees and expenses. The fees and expenses were necessary
8 and for the legal representation of Monarch. The legal work included advising
9 Monarch on rates, review of the application, preparation of pleadings, review and
10 preparation of evidentiary exhibits, and preparation of testimony to be submitted for
11 the rate application to be filed with the Commission.

12 The hourly rates for attorneys of \$250-\$435 and for the paralegal of \$135,
13 upon which the billings are based, are the same hourly rates charged other clients for
14 comparable services during the same time frame. Our firm's hourly rates are at the
15 lower end of the range compared to the rates charged by other lawyers with similar
16 experience providing similar services. To minimize expenses, I used associates and
17 paralegals where possible because of their lower billing rates. In assigning the tasks
18 to attorneys, I ensured that the attorneys did not duplicate the work of one another.
19 The hours spent to perform the tasks assigned to Lloyd Gosselink were necessary to
20 complete those tasks in a professional manner and on a timely basis. All of the work
21 performed by Lloyd Gosselink to date was accomplished by just three lawyers. My
22 many years of experience participating in utility rate cases aid in our efforts to keep
23 rate case expenses reasonable.

1 The invoices submitted by Lloyd Gosselink include a description of services
2 performed and time expended on each activity. The invoices dated from May 14,
3 2019, through June 11, 2020, for this proceeding are attached to my testimony as
4 Attachment RLT-3. Lloyd Gosselink has documented all charges with time sheets,
5 invoices, and records. Neither Lloyd Gosselink nor any consultants for Monarch
6 have charged for luxury items, including first-class airfare, limousine service,
7 entertainment, or alcoholic beverages. No meals were charged in excess of \$25 per
8 person, and no individual billed for more than 12 hours per day. The documentation
9 in this case is similar to that provided in many previous rate cases before the
10 Commission.

11 The current amount requested for legal expenses of \$23,843.98 is reasonable
12 given the complexity of this case. Monarch anticipates that it will incur additional
13 attorney fees associated with its rate application, especially if a contested case hearing
14 is conducted, and reserves the right to request additional incurred rate case expenses
15 at the appropriate time.

16 **Q. DOES MONARCH'S RATE APPLICATION INCLUDE ANY NOVEL OR**
17 **DIFFICULT ISSUES THAT A TYPICAL WATER UTILITY APPLICATION**
18 **DOES NOT INCLUDE?**

19 A. The preparation of Monarch's Rate Application included a variety of novel, difficult,
20 and complex issues. First, the Rate Application includes multiple water utility
21 systems and wastewater utility systems that each require evaluation and analysis.
22 Second, because the Commission's rules governing rate applications for Class A
23 utilities such as Monarch are relatively new and because this is the second Class A
24 utility rate application filed at the Commission—with Monarch being the only Class

1 A utility to have filed a rate application and that application was ultimately settled,
2 Monarch has no Commission precedent on many issues upon which Monarch could
3 rely in preparing its application. Although the Commission's rules are generally
4 patterned after previous rules and regulations governing rate setting for water and
5 wastewater utilities, the current rules contain some significant differences from
6 previous rules and regulations.

7 **Q. ARE THE LEGAL EXPENSES THAT MONARCH IS SEEKING TO**
8 **RECOVER JUST, REASONABLE, NECESSARY, AND IN THE PUBLIC**
9 **INTEREST? PLEASE EXPLAIN.**

10 A. Yes. The legal expenses that Monarch seeks to recover are just, reasonable,
11 necessary, and in the public interest. An investor-owned utility, such as Monarch,
12 cannot change its rates to allow it to recover its reasonable expenses and earn a
13 reasonable return on its investment unless a rate change application is prepared.
14 Recovery of reasonable and necessary legal expenses associated with preparation of a
15 rate application have long been recoverable, is allowed by Commission rule, and is
16 authorized by Texas Water Code Ann. § 13.185(g). For the reasons I mentioned
17 above, it was reasonable and necessary for Monarch to seek legal advice and
18 assistance in the prosecution of Monarch's Rate Application, the time spent was
19 reasonable and necessary, and the hourly rates charges are reasonable.

20 **Q. WAS IT REASONABLE AND NECESSARY FOR MONARCH TO INCUR**
21 **LEGAL EXPENSES TO PREPARE PREFILED DIRECT TESTIMONY?**

22 A. Yes. The Commission's rules at 16 TAC § 24.27 recognize the complexities that may
23 be involved in the preparation and prosecution of a rate application for Class A
24 utilities such as Monarch.

1 **Q. DID MONARCH INCUR ANY CONSULTANT EXPENSES IN THIS RATE**
2 **CASE?**

3 A. Yes. Monarch incurred the expenses associated with the following experts:
4 Alliance Consulting Group (“Alliance”) and FINCAP, Inc. (“FINCAP”).

5 **Q. ARE THE CONSULTANT EXPENSES FOR ALLIANCE INCURRED IN**
6 **THIS RATE CASE REASONABLE AND NECESSARY?**

7 A. Yes. For the period of May 1, 2020, through May 31, 2020, the expenses for Alliance
8 are \$7,322.50. Based on my years of experience working with utility consultants, Mr.
9 Watson’s hourly rate of \$270 and hourly rates of his associates, upon which the
10 billings are based, is comparable to rates charged by consultants with similar levels of
11 expertise and experience as Mr. Watson. I have also reviewed the number of hours
12 Mr. Watson and his associates have spent on the review, analysis, and testimony
13 regarding depreciation in this proceeding, and can testify that this amount is
14 appropriate given the level of complexity of this case. The Alliance invoice for
15 services dated from May 1, 2020, through May 31, 2020, for this proceeding is
16 attached to my testimony as Attachment RLT-4. The amount requested for consultant
17 expenses of \$7,322.50, as of the date of filing, is reasonable. The consultant expenses
18 will be supplemented at the hearing on the merits.

19 **Q. ARE THE CONSULTANT EXPENSES FOR FINCAP INCURRED IN THIS**
20 **RATE CASE REASONABLE AND NECESSARY?**

21 A. Yes. For the period of May 1, 2020, through June 25, 2020, the expenses for
22 FINCAP are \$14,400.00. Based on my years of experience working with utility
23 consultants, Mr. Fairchild’s hourly rate of \$450, upon which the billings are based, is
24 comparable to rates charged by consultants with similar levels of expertise and

1 experience as Mr. Fairchild. I have also reviewed the number of hours Mr. Fairchild
2 and his associates have spent on their review, analysis, responding to discovery, and
3 testimony in this proceeding and can testify that this amount is appropriate given the
4 level of complexity of this case. The amount requested for consultant expenses of
5 \$14,400.00 is reasonable. The invoices submitted by FINCAP include a description
6 of services performed and time expended on each activity. The FINCAP invoice
7 dated from May 1, 2020, through June 25, 2020, for this proceeding is attached to my
8 testimony as Attachment RLT-5. The consultant expenses will be supplemented at
9 the hearing on the merits.

10 **Q. DOES MONARCH INTEND TO RECOVER ITS RATE CASE EXPENSES?**

11 A. Yes.

12 **Q. HOW DOES MONARCH INTEND TO RECOVER ITS RATE CASE**
13 **EXPENSES?**

14 A. Rate case expenses (legal, consultants, and non-legal/non-consultants) are non-
15 recurring expenses and are generally recovered through a surcharge on customers'
16 bills. That is what Monarch is requesting in this case. Monarch proposes to recover
17 reasonable and necessary rate case expenses through a surcharge assessed over a
18 24-month period.

19 Water utilities are permitted to recover their reasonable expenses, including
20 rate case expenses, from their customers pursuant to Texas Water Code Ann.
21 §§ 13.183, 13.185, and 13.1871, and 16 TAC § 24.44. Therefore, I recommend that
22 Monarch be permitted to recover through a surcharge its reasonable legal, consultant,
23 and non-legal/non-consultant rate case expenses.

1

IV. CONCLUSION

2 **Q. DOES THIS CONCLUDE YOUR TESTIMONY AT THIS TIME?**

3 A. Yes, it does. I reserve the right to make corrections, revisions, or deletions at the time
4 of a hearing on the merits.



LAMBETH TOWNSEND PRINCIPAL

512.322.5830



Lambeth Townsend practices law in State and Federal courts and administrative tribunals. Lambeth represents companies and political subdivisions across a wide spectrum of regulatory and commercial activities. Lambeth focuses on all aspects of utility and water law. Prior to joining Lloyd Gosselink, Lambeth was General Counsel for the Public Utility Commission of Texas, 1987 – 89, and Assistant Attorney General for the State of Texas, 1977 – 84.

PRACTICE AREAS

- Administrative Law and Contested Permits
 - Air and Waste
 - Appellate
 - Compliance and Enforcement
 - Energy and Utility
 - Litigation
 - Regulatory Enforcement
- Water

PROFESSIONAL LICENSES & EDUCATION

- Admitted to State Bar of Texas
- Admitted to U.S. Supreme Court, U.S. Court of Appeals for the Fifth Circuit and District of Columbia, and U.S. District Court for the Western, Eastern, and Northern Districts of Texas
- Board Certified in Administrative Law, Texas Board of Legal Specialization
- J.D., St. Mary's University
- B.A., University of Texas at Austin

REPRESENTATIVE EXPERIENCE

- Represents clients in permitting matters at the Texas Commission on Environmental Quality and Public Utility Commission and in appeals of agency actions in state courts, including District Courts, Courts of Appeal, and the Texas Supreme Court
- Represents utility and political subdivision clients in contract litigation and defends clients in agency enforcement actions
- Represents investor, cooperative, and municipally owned electric, water, and wastewater utilities in all aspects of their business and regulation
- Represents and advises clients in negotiating and contracting for the sale and purchase of electric, water, and wastewater utilities and obtaining the required regulatory approvals
- Represents clients in negotiating wholesale supply and wholesale services contracts



- Represents clients at the Railroad Commission of Texas concerning intrastate pipeline rates and retail distribution rates
- Represents clients at Public Utility Commission concerning rates, services, and certificates of convenience and necessity
- Represents utility and political subdivision clients at Public Utility Commission in rulemaking proceedings, including open access transmission, restructure of the regulation of electric utilities for retail competition, market design for the competitive wholesale power market, and in applications for certificates of convenience and necessity ("CCN") for transmission lines

PUBLICATIONS & PRESENTATIONS

- Author, Cancellation of Water Rights in Texas: Use It, or Lose It, 17 St. Mary's Law Journal 1217 (1986)
- Co-author, "Standards for Determining the Public Interest in Merger Cases: Application to Texas Public Utilities," 13 Tex. Journal of Corporate Counsel 84 (1994)

PROFESSIONAL ASSOCIATIONS & MEMBERSHIPS

- American Bar Association
- Austin Bar Association
- State Bar of Texas

HONORS & AWARDS

- AV Peer Review Rated by Martindale-Hubbell
- The Best Lawyers in America®: 2010-2020
- Selected Texas Super Lawyers List, Thomson Reuters: 2011-2019
- Listing by Chambers and Partners USA for Energy: State Regulatory & Litigation (Electricity) – Texas 2020, Band 3

**D#45570 / Monarch
Rate Case Expenses**

LGR T	Date	LGR T Inv. #	LGR T Fees	Non-Consultant Disbursements	LGR T Fees + Non-Consultant Disbursements	LGR T INVOICE ACTUAL TOTAL
	5/16/2019	97500501	\$ 1,645.50		\$ 1,645.50	\$ 1,645.50
	6/19/2019	97501557	\$ 3,039.00	\$ 52.57	\$ 3,091.57	\$ 3,091.57
	7/9/2019	97502290	\$ 1,157.00		\$ 1,157.00	\$ 1,157.00
	8/14/2019	97503015	\$ 169.00		\$ 169.00	\$ 169.00
	11/13/2019	97505352	\$ 2,013.50		\$ 2,013.50	\$ 2,013.50
	12/17/2019	97505708	\$ 96.00		\$ 96.00	\$ 96.00
	1/17/2020	97506453	\$ 13.00		\$ 13.00	\$ 13.00
	2/24/2020	97507625	\$ 2,305.50	\$ 5.41	\$ 2,310.91	\$ 2,310.91
	3/16/2020	97508202	\$ 1,010.50		\$ 1,010.50	\$ 1,010.50
	4/21/2020	97509660	\$ 386.00		\$ 386.00	\$ 386.00
	5/15/2020	97510513	\$ 6,192.50		\$ 6,192.50	\$ 6,192.50
	6/11/2020	97511160	\$ 5,758.50		\$ 5,758.50	\$ 5,758.50
Totals			\$ 23,786.00	\$ 57.98	\$ 23,843.98	\$ 23,843.98
					LGRT TOTAL	\$ 23,843.98
Alliance Consulting Group	Date	ACG Inv. #	ACG Fees	Disbursements	ACG Invoice Total	
	5/31/2020	20-0514	\$ 7,332.50			\$ 7,332.50
	Totals					
						ACG TOTAL
FINCAP, Inc.	Date	FINCAP Inv. #	FINCAP Fees	Disbursements	FINCAP Invoice Total	
	6/25/2020	02110	\$ 14,400.00		\$ 14,400.00	\$ 14,400.00
	Totals					
						FINCAP TOTAL

TOTAL RATE CASE EXPENSES **\$ 45,576.48**



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May 14, 2019

Monarch Utilities I LP
 Attn Ken Dix
 1325 North Grand Avenue Suite 100
 Covina, CA USA 91724

Invoice: 97500501
 Client: 3176
 Matter: 24
 Billing Attorney: RLT

INVOICE SUMMARY

For professional services and disbursements rendered through April 30, 2019:

RE: 2020 Rate Case

Professional Services	\$ 1,645.50
Total Disbursements	<u> \$.00</u>
TOTAL THIS INVOICE	\$ 1,645.50

Lloyd Gosselink Rochelle & Townsend, P.C.

Monarch Utilities I LP
2020 Rate Case
I.D.3176-24-RLT

May 14, 2019
Invoice: 97500501

PROFESSIONAL SERVICES RENDERED

Date	Atty	Description Of Services Rendered	Hours
4/16/19	RLT	Review correspondence; research 2011 rate application file for documents to prove that Monarch is the company that served in 24 counties as of January 1, 2003 to qualify for consolidated rates under TWC 13.145(b); instruction to H. Campbell regarding preparation of documents for client; correspondence.	2.50
4/16/19	HEC	Case management.	.30
4/17/19	RLT	Review correspondence; correspondence.	.60
4/17/19	HEC	Case management.	.10
4/18/19	RLT	Review correspondence; correspondence; teleconference with C. Profilet.	.40
4/22/19	RLT	Office conference with C. Faulk regarding tasks to be performed for preparation of rate application.	.20
4/22/19	WAF	Office conference with L. Townsend regarding 2020 rate case.	.20

TOTAL PROFESSIONAL SERVICES

\$ 1,645.50

SUMMARY OF PROFESSIONAL SERVICES

Name	Staff Level	Hours	Rate	Total
R Lambeth Townsend	Principal	3.70	415.00	1,535.50
William A Faulk III	Associate	.20	290.00	58.00
Hanna E Campbell	Paralegal	.40	130.00	52.00
TOTALS		4.30		\$ 1,645.50

TOTAL THIS INVOICE

\$ 1,645.50



816 Congress Avenue, Suite 1900
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June 17, 2019

Monarch Utilities I LP
 Attn Ken Dix
 1325 North Grand Avenue Suite 100
 Covina, CA USA 91724

Invoice: 97501557
 Client: 3176
 Matter: 24
 Billing Attorney: RLT

INVOICE SUMMARY

For professional services and disbursements rendered through May 31, 2019:

RE: 2020 Rate Case

Professional Services	\$ 3,039.00
Total Disbursements	<u>\$ 52.57</u>
TOTAL THIS INVOICE	\$ 3,091.57

Lloyd Gosselink Rochelle & Townsend, P.C.

Monarch Utilities I LP
2020 Rate Case
I.D.3176-24-RLT

June 17, 2019
Invoice: 97501557

PROFESSIONAL SERVICES RENDERED

Date	Atty	Description Of Services Rendered	Hours
5/02/19	RLT	Office conference with C. Faulk regarding tasks to be performed.	.20
5/02/19	WAF	Office conference with L. Townsend regarding PUC research.	.20
5/02/19	HEC	Review application in Docket No. 45570; phone conferences with Public Utility Commission Central Records clerk regarding inspecting records for CCN No.'s 12983 and 20899; email correspondences with same.	.50
5/06/19	HEC	Email correspondences with Public Utility Commission Central Records clerk; travel to Public Utility Commission Central Records; inspect documents related to CCN 12983.	2.30
5/07/19	HEC	Travel to Public Utility Commission Central Records; inspect documents related to CCN 12983.	3.70
5/08/19	HEC	Travel to Public Utility Commission Central Records; inspect documents related to CCN 12983.	2.70
5/09/19	RLT	Review documents regarding Tecon retrieved by H. Campbell and instructions to H. Campbell regarding additional document retrieval.	1.00
5/10/19	HEC	Travel to Public Utility Commission Central Records; inspect documents related to CCN 12983.	4.90
5/13/19	HEC	Travel to Public Utility Commission Central Records; inspect documents related to CCN 12983.	2.00
5/14/19	HEC	Travel to Public Utility Commission Central Records; inspect documents related to CCN 12983.	3.00

TOTAL PROFESSIONAL SERVICES

\$ 3,039.00

SUMMARY OF PROFESSIONAL SERVICES

Name	Staff Level	Hours	Rate	Total
R Lambeth Townsend	Principal	1.20	415.00	498.00
William A Faulk III	Associate	.20	290.00	58.00
Hanna E Campbell	Paralegal	19.10	130.00	2,483.00
TOTALS		20.50		\$ 3,039.00

DISBURSEMENTS

Date	Description	Amount
5/06/19	Hanna Campbell Check # - 009905515 Travel Expenses Lyft ride to PUC (inspecting CCN 12983 documents) from office. 5/6/19.	8.59

Lloyd Gosselink Rochelle & Townsend, P.C.

Monarch Utilities I LP
2020 Rate Case
I.D.3176-24-RLT

June 17, 2019
Invoice: 97501557

Date	Description	Amount
5/07/19	Hanna Campbell Check # - 009905515 Travel Expenses Lyft ride to PUC Central Records to inspect CCN 12983 records.	8.59
5/08/19	Hanna Campbell Check # - 009905575 Travel Expenses Lyft ride to PUC Central Records to inspect records pertaining to CCN 12983. Copy Service	8.43 9.74
5/13/19	Hanna Campbell Check # - 009905575 Travel Expenses Lyft ride to PUC Central Records to inspect records relating to CCN 12983.	8.66
5/14/19	Hanna Campbell Check # - 009905575 Travel Expenses Lyft ride to PUC Central Records to inspect records relating to CCN 12983.	8.56
TOTAL DISBURSEMENTS		\$ 52.57
TOTAL THIS INVOICE		\$ 3,091.57

From: Lyft Ride Receipt <no-reply@lyft.com>
Date: May 6, 2016 at 5:01:25 PM CDT
To: hanna_r_campbell@yahoo.com
Subject: Your ride with Rohil on May 6

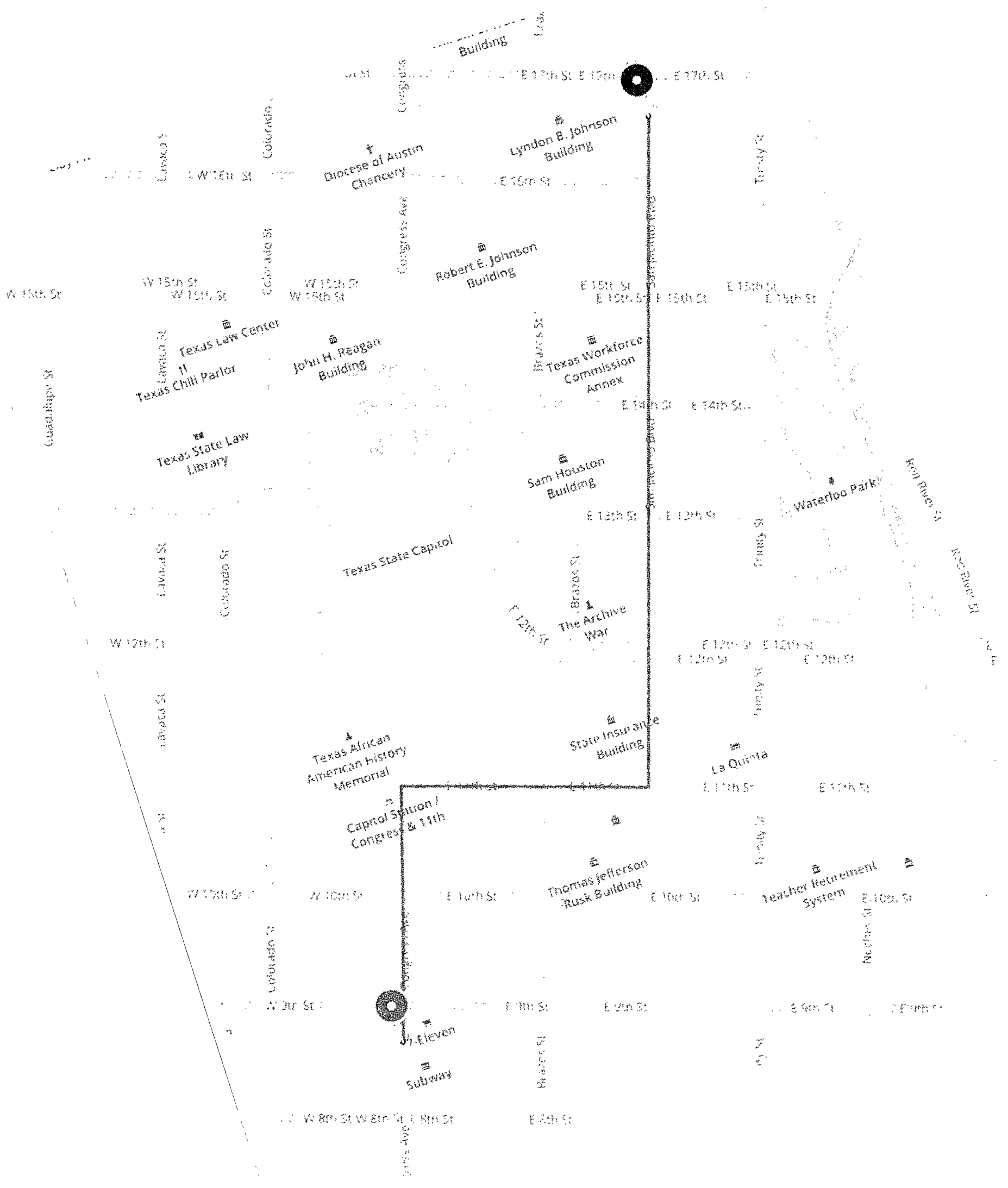


Thanks for riding with Rohil!

May 6, 2016 at 5:17 PM

Ride Details

Lyft fare (0.71mi, 3m 23s)	\$5.94
Tip	\$2.00
<hr/>	<hr/>
visa Visa *2516	\$7.94



From: Lyft Ride Receipt <no-reply@lyftmail.com>
Date: May 6 2019 at 2:50:20 PM CDT
To: hanna.c.campbell@yahoo.com
Subject: Your ride with Harry on May 6



Thanks for riding with Harry!

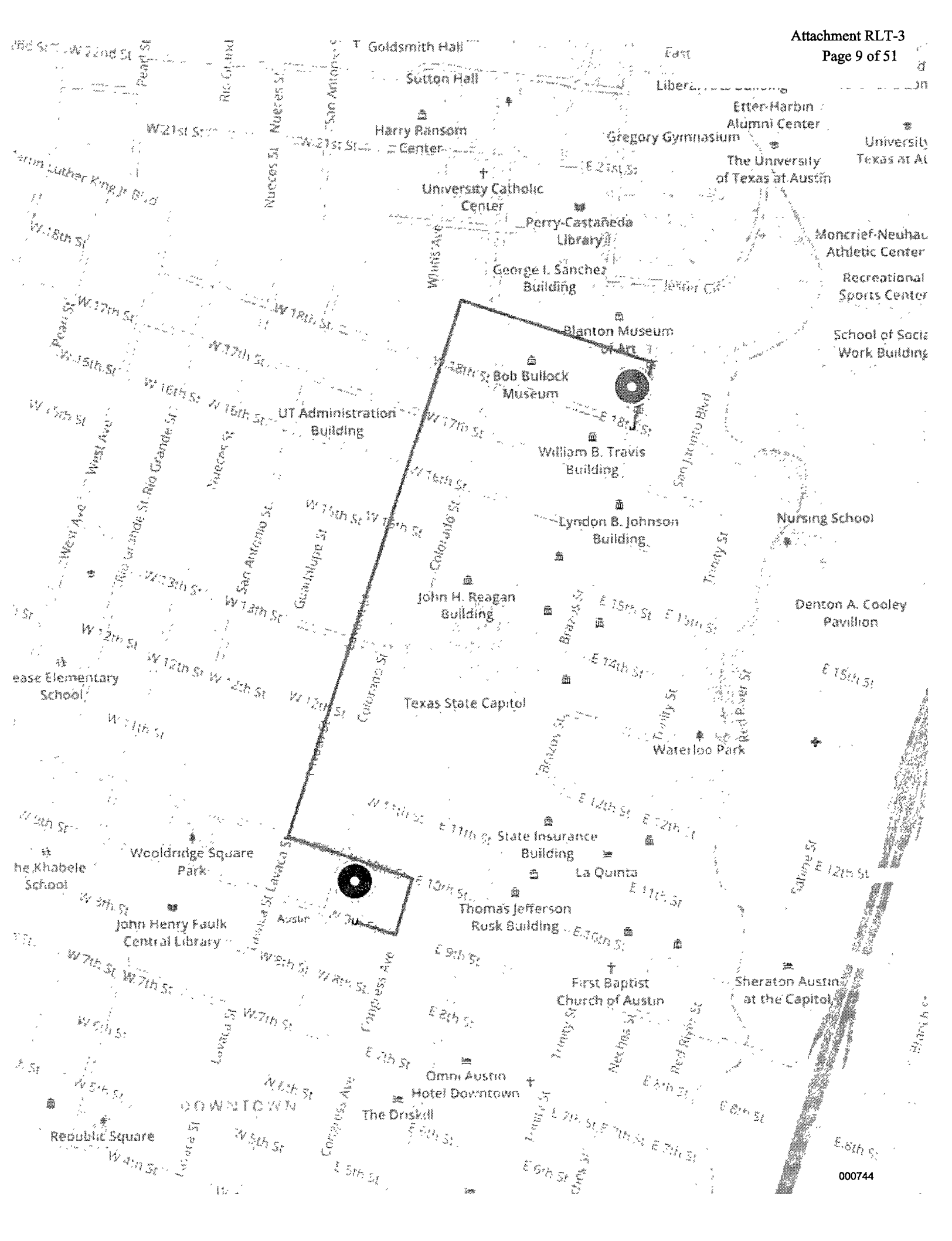
May 6 2019 at 2:50 PM

Ride Details

Lyft fare (1 19mi 5m 31s) \$6.59
Tip \$2.00

VISA Visa *2516 \$8.59

Lyft Driver: Harry Campbell
Ride ID: 1234567890
Start: 1234567890
End: 1234567890



From: Lyft Ride Receipt <no-reply@lyft.com>
Date: May 7 2019 at 1 30:49 PM CDT
To: anna_campbell@yahoo.com
Subject: Your ride with Billy on May 7



Thanks for riding with Billy!

May 7 2019 at 1:24 PM

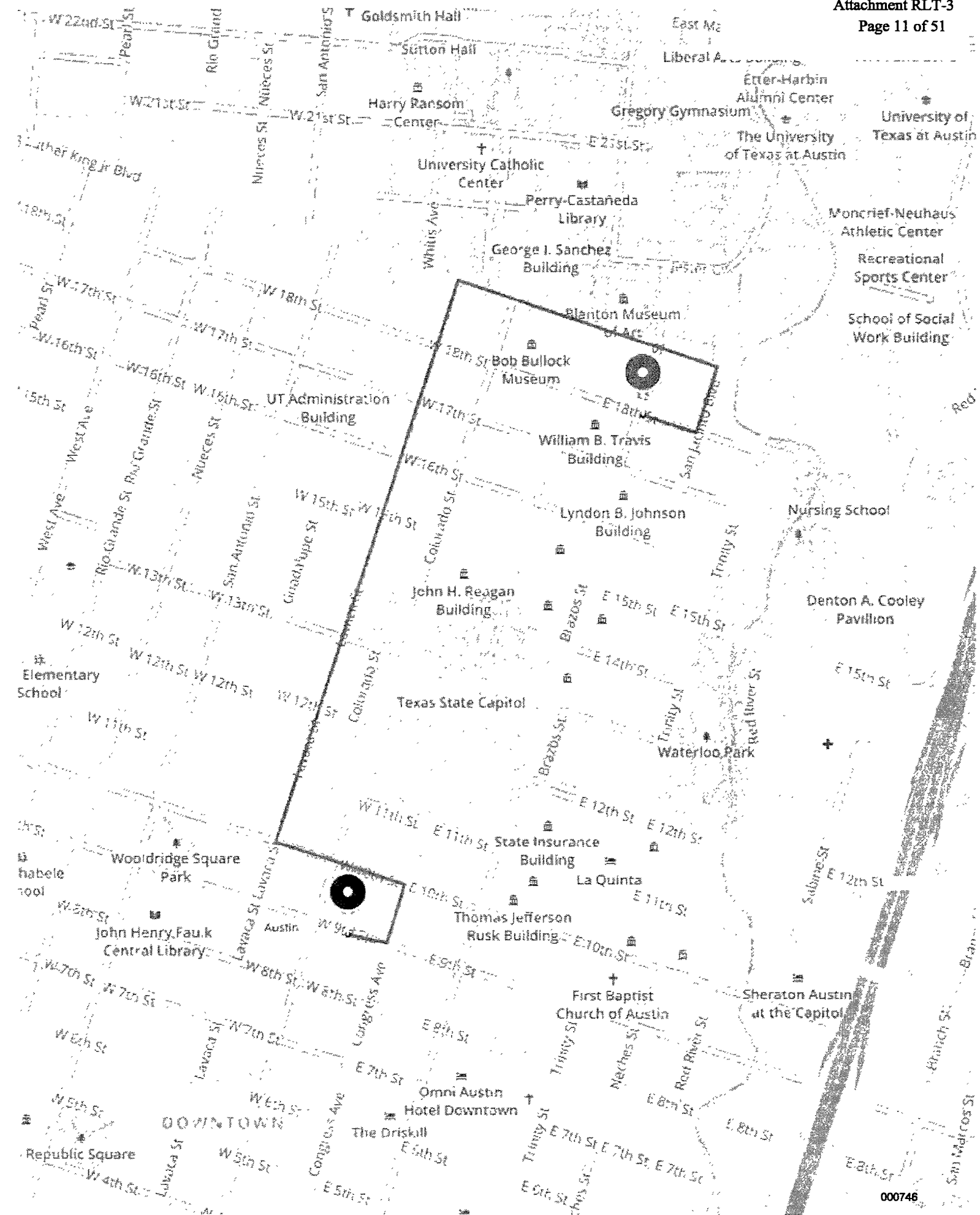
Ride Details

Lyft fare (1.29mi, 8m 35s)	\$6.59
Tip	\$2.00

Visa *2516

\$8.59





From: Lyft Ride Receipt <no-reply@lyft.com>
Date: May 7, 2019 at 7:07 05 PM CDT
To: hanna.g.campos@va.gov.com
Subject: Your ride with Aung on May 7

lyft



Thanks for riding with Aung!

May 7, 2019 at 7:07 PM

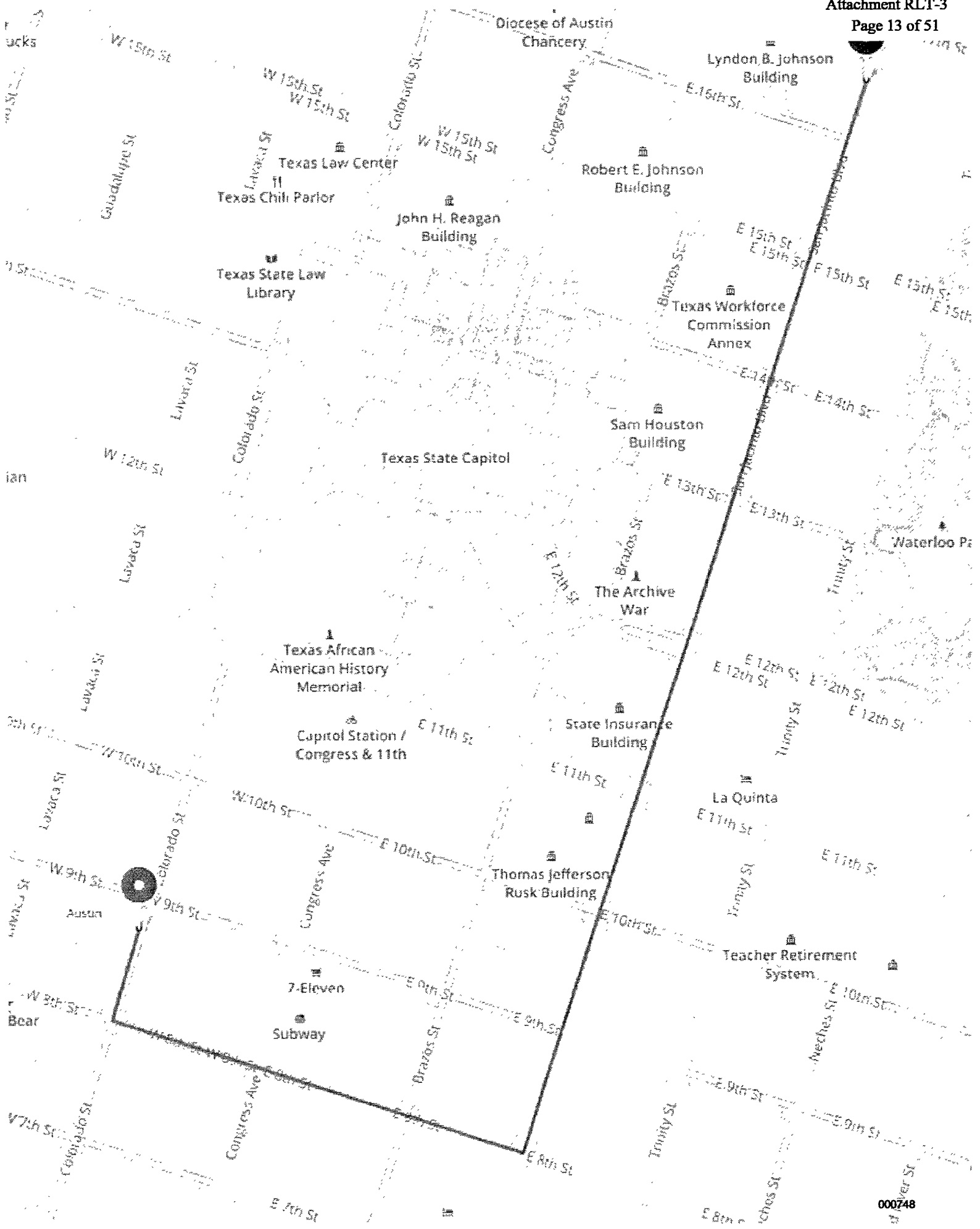
Ride Details

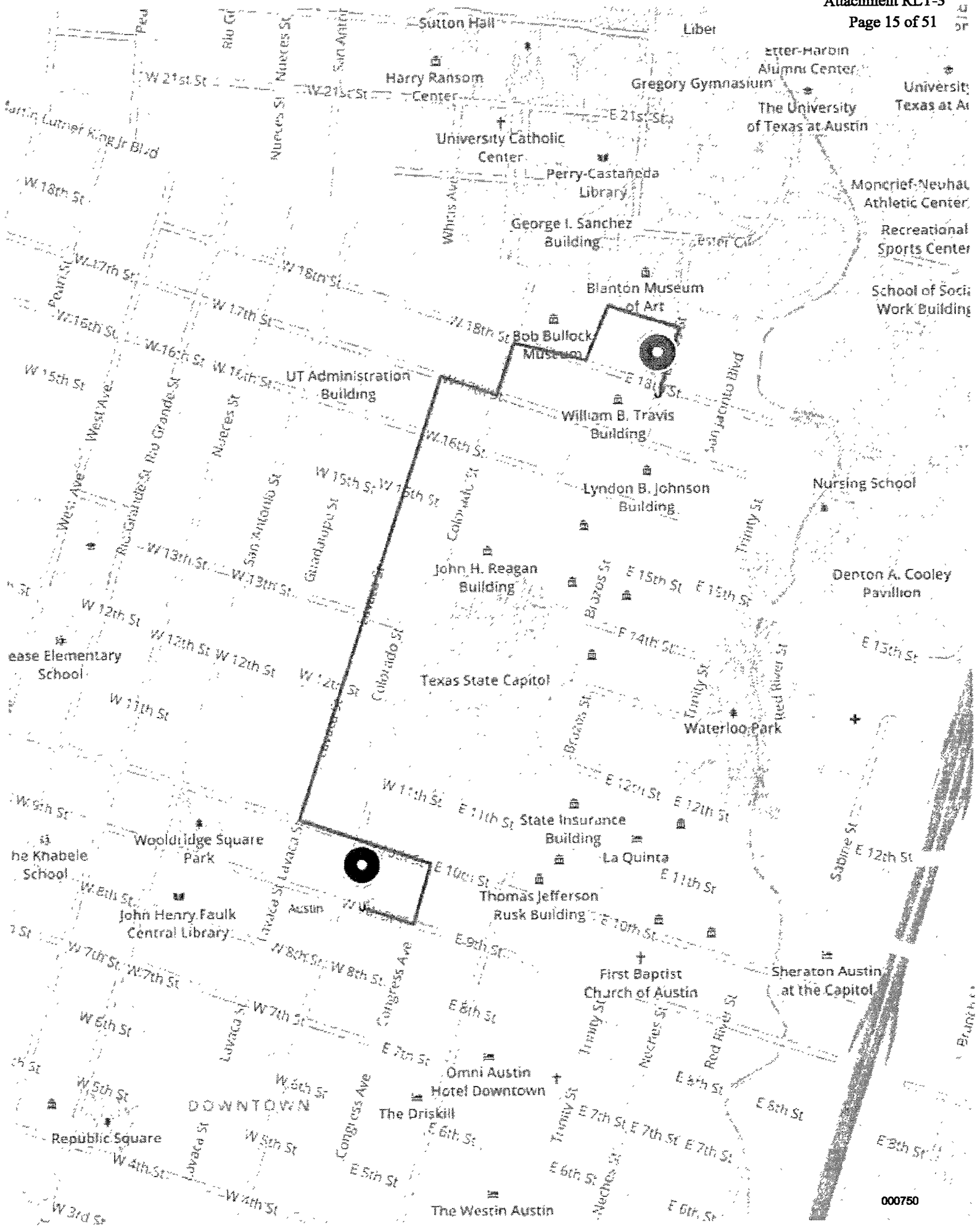
Lyft fare (0.88mi, 5m 20s)	\$5.05
Tip	\$2.00

via Visa ****

\$7.95

Sea Breeze
 10000
 Lyndon B. Johnson
 Freeway





From: Lyft Ride Receipt <10.rides@lyft.com>
Date: May 8 2019 at 4:49:03 PM CDT
To: lanita_c_campbell@vanoo.com
Subject: Your ride with Enrique on May 8



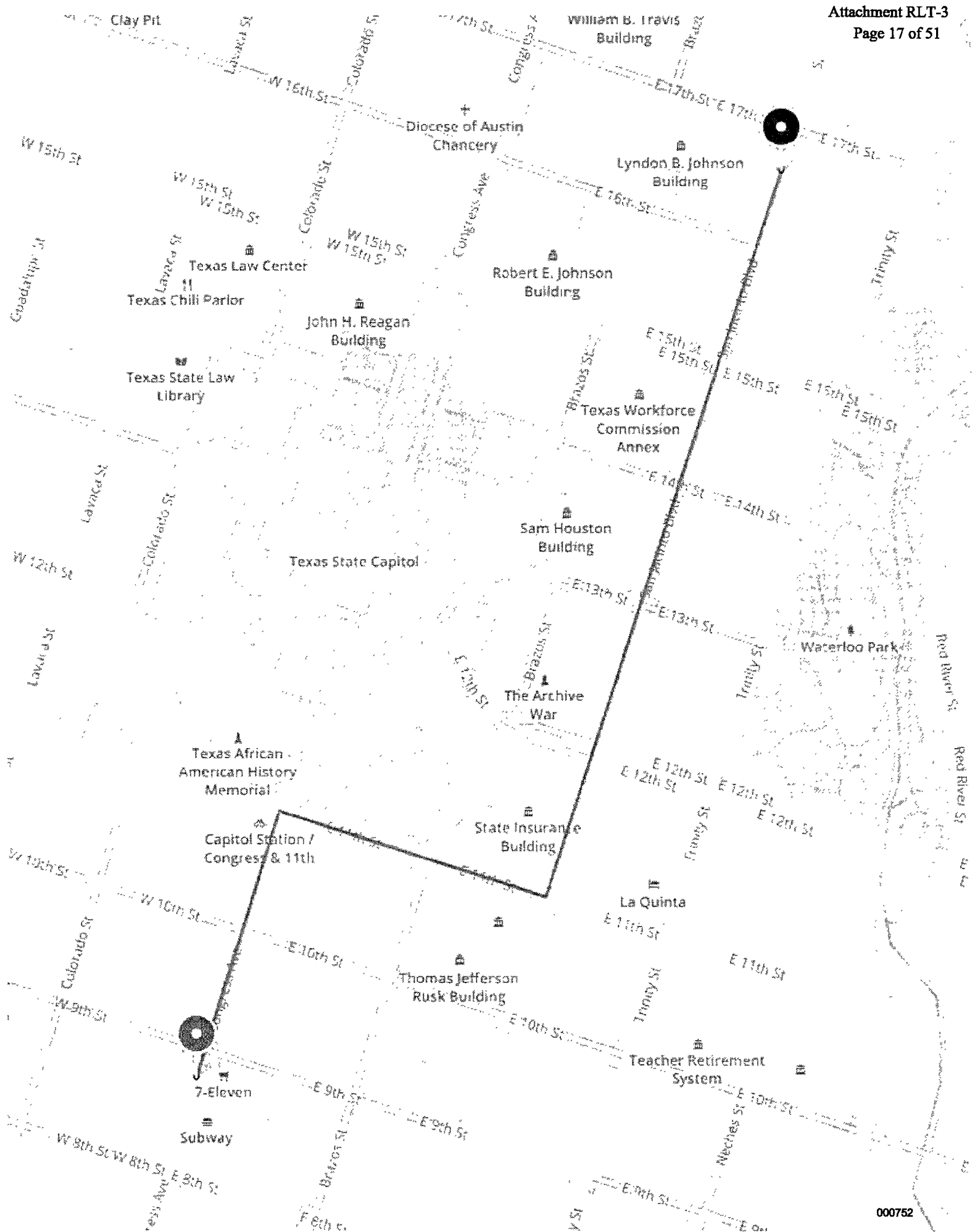
Thanks for riding with Enrique!

May 8 2019 at 4:49 PM

Ride Details

Lyft fare (0.71mi, 4m 58s)	\$6.43
Tip	\$2.00
total Vehicle #2536	\$8.43





PUBLIC UTILITY COMM OF TX
1701 N CONGRESS
SUITE 8 100
AUSTIN, TX 78711
512-936-7180

PUBLIC UTILITY COMM OF TX
1701 N CONGRESS
SUITE 8 100
AUSTIN, TX 78711
512-936-7180

PUBLIC UTILITY COMM OF TX
0017340000802699124300

PUBLIC UTILITY COMM OF TX

Date: 05/08/2019 04:33:36 PM

Date: 05/08/2019 04:33:36 PM

CREDIT CARD SALE

CREDIT CARD SALE

VISA
CARD NUMBER: *****2516 K
TRAN AMOUNT: \$9.74
APPROVAL CD: 00107C
RECORD #: 000
CLERK ID: 655708

VISA
CARD NUMBER: *****2516 K
TRAN AMOUNT: \$9.74
APPROVAL CD: 00107C
RECORD #: 000
CLERK ID: 655708

Thank you!

Customer Copy

X _____
{CARDHOLDER'S SIGNATURE}

I AGREE TO PAY THE ABOVE TOTAL AMOUNT
ACCORDING TO THE CARD ISSUER AGREEMENT
(MERCHANT AGREEMENT IF CREDIT VOUCHER)

Thank you!

Merchant Copy

From: Lyft Ride Receipts <no-reply@lyft.com>
Date: May 13, 2019 at 2:13:35 PM CDT
To: hanna_c_campbell@yahoo.com
Subject: Your ride with MANESH on May 13



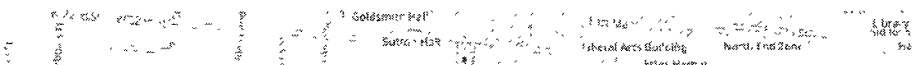
Thanks for riding with MANESH!

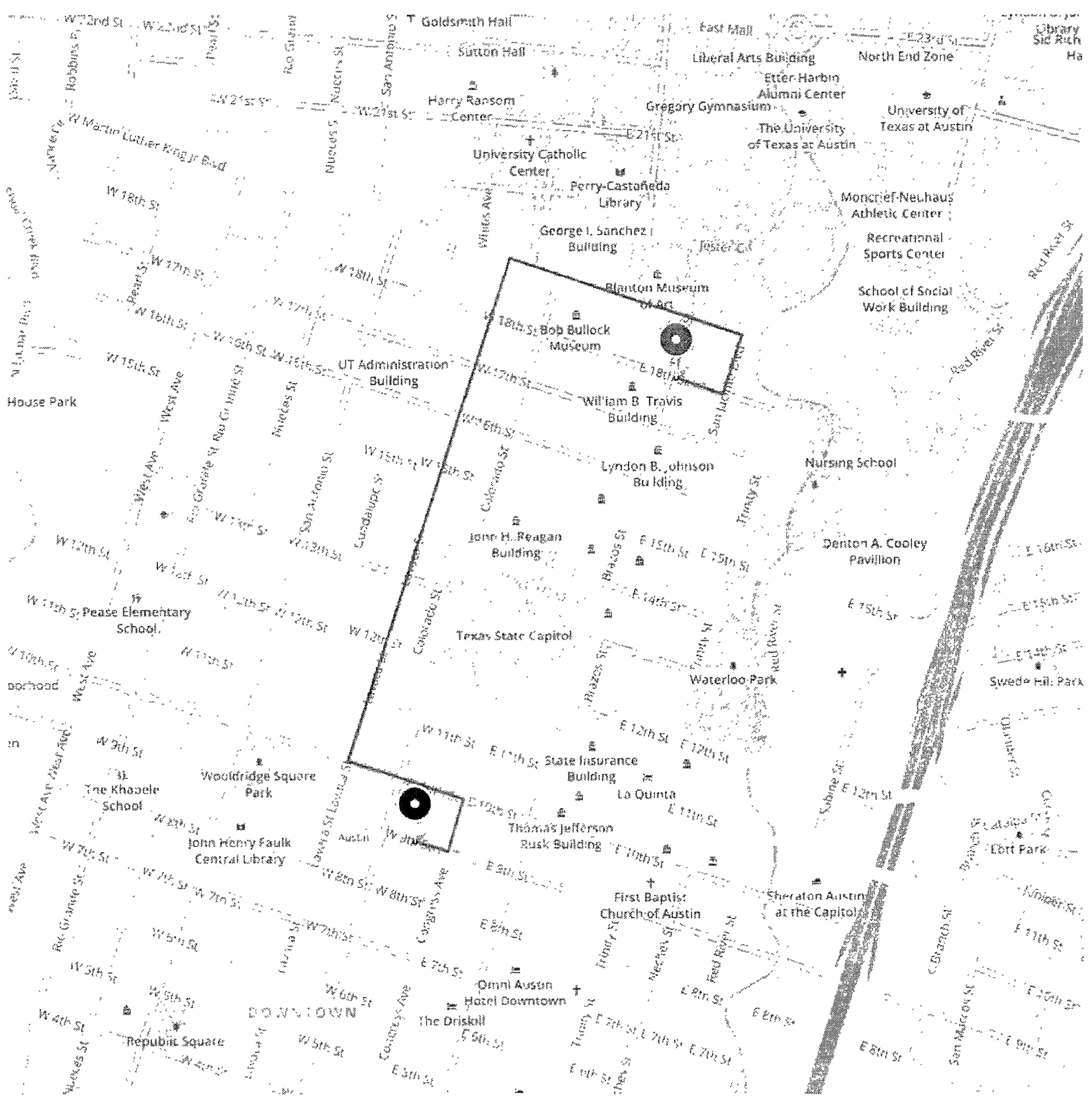
May 13, 2019 at 2:14 PM

Ride Details

Lyft fare (130m, 6m 22s)	\$6.00
Tip	\$2.00

*** Visa ****2516 **\$8.66**





From: Lyft Ride Receipt <no-reply@lyftmail.com>
Date: May 13, 2019 at 5:26:22 PM CDT
To: hanna.c.campbell@yahoo.com
Subject: Your ride with Izzy on May 13

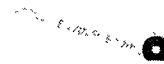
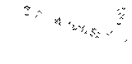


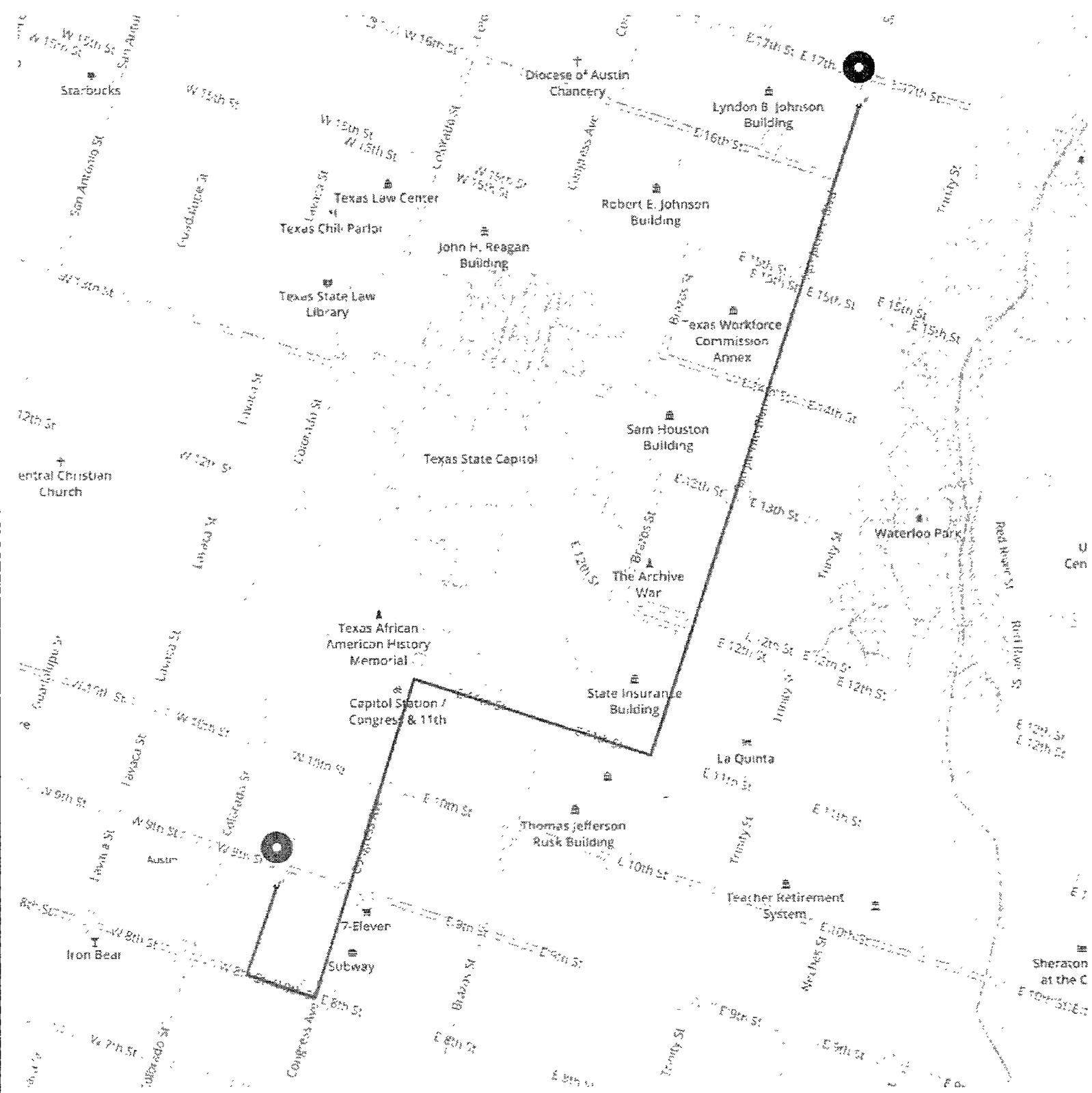
Thanks for riding with Izzy!

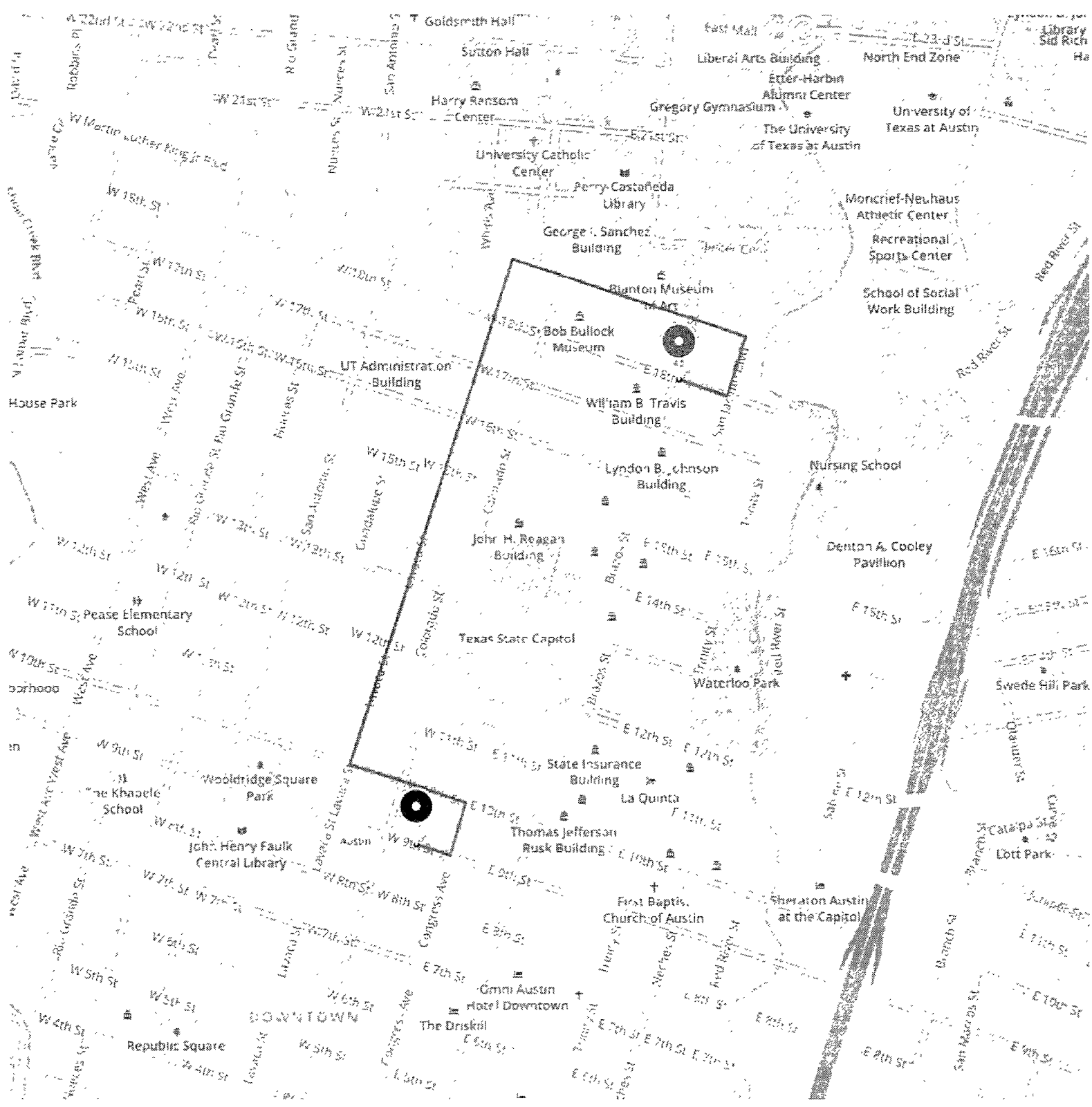
May 13, 2019 at 4:55 PM

Ride Details

Lyft fare (0.84mi, 3m 45s)	\$5.94
Tip	\$2.00
*** Visa #2516	\$7.94







From: Lyft Ride Receipt <no-reply@lyft.com>
Date: May 14, 2019 at 4:59:05 PM CDT
To: hanna_e_campbell@yahoo.com
Subject: Your ride with Jason on May 14



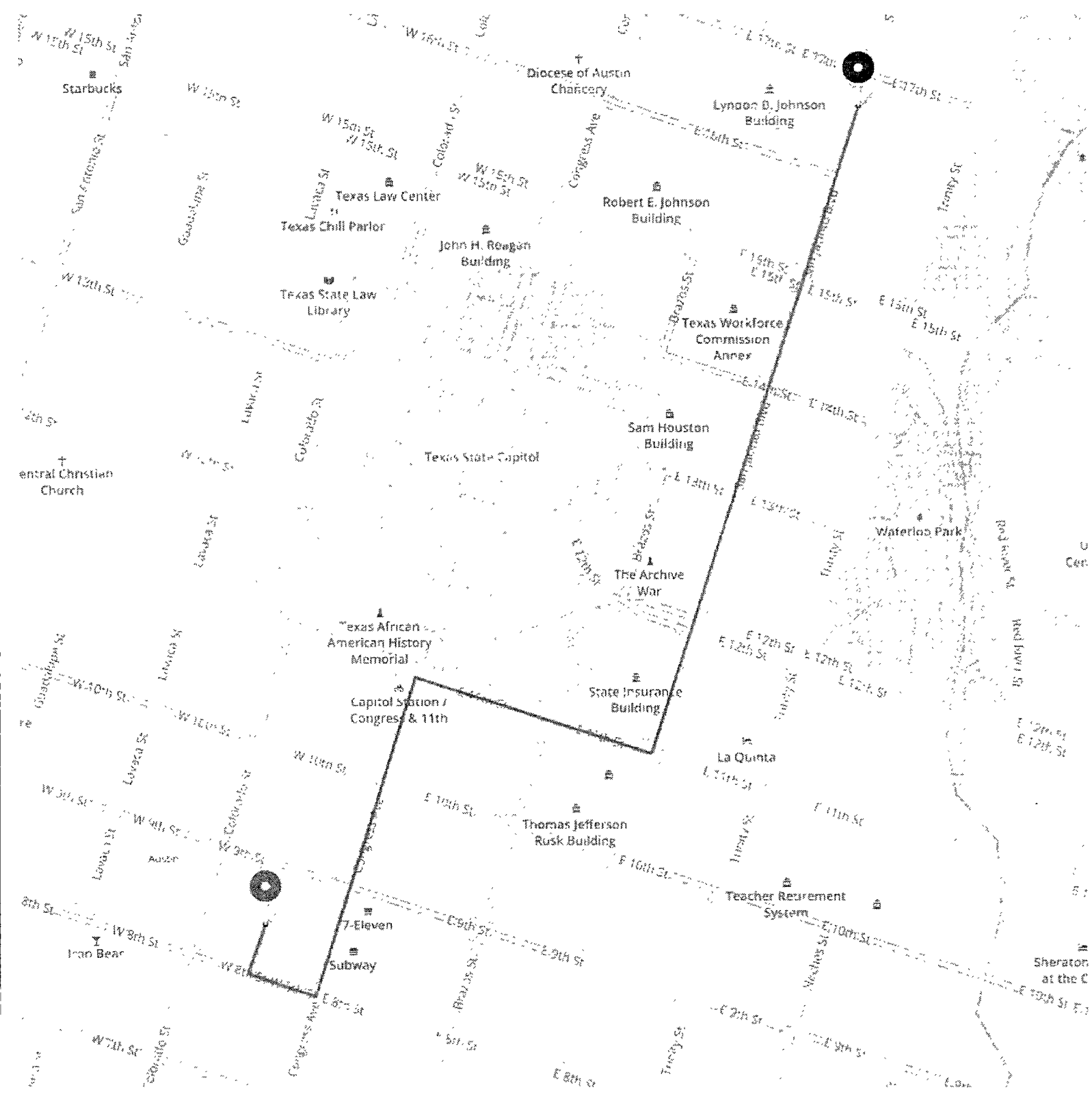
Thanks for riding with Jason!

May 14, 2019 at 4:14 PM

Ride Details

Lyft fare (0 82mi 2m 39s)	\$6.47
Tip	\$2.00
<hr/>	
VISA Visa *2516	\$8.47







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 Austin, Texas 78701
 Telephone: (512) 322-5800
 Facsimile: (512) 472-0532

www.lglawfirm.com

July 9, 2019

Monarch Utilities I LP
 Attn Ken Dix
 1325 North Grand Avenue Suite 100
 Covina, CA USA 91724

Invoice: 97502290
 Client: 3176
 Matter: 24
 Billing Attorney: RLT

INVOICE SUMMARY

For professional services and disbursements rendered through June 30, 2019:

RE: 2020 Rate Case

Professional Services	\$ 1,157.00
Total Disbursements	<u> \$.00</u>
TOTAL THIS INVOICE	\$ 1,157.00

Lloyd Gosselink Rochelle & Townsend, P.C.

Monarch Utilities I LP
 2020 Rate Case
 I.D.3176-24-RLT

July 9, 2019
 Invoice: 97502290

PROFESSIONAL SERVICES RENDERED

Date	Atty	Description Of Services Rendered	Hours
6/13/19	HEC	Inspect records pertaining to CCN 12983.	5.50
6/14/19	HEC	Inspect records pertaining to CCN 12983.	3.40

TOTAL PROFESSIONAL SERVICES **\$ 1,157.00**

SUMMARY OF PROFESSIONAL SERVICES

Name	Staff Level	Hours	Rate	Total
Hanna E Campbell	Paralegal	8.90	130.00	1,157.00
TOTALS		8.90		\$ 1,157.00

TOTAL THIS INVOICE **\$ 1,157.00**



816 Congress Avenue, Suite 1900
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August 14, 2019

Monarch Utilities I LP
 Attn William "Ken" Dix
 1325 North Grand Avenue Suite 100
 Covina, CA USA 91724

Invoice: 97503015
 Client: 3176
 Matter: 24
 Billing Attorney: RLT

INVOICE SUMMARY

For professional services and disbursements rendered through July 31, 2019:

RE: 2020 Rate Case

Professional Services	\$ 169.00
Total Disbursements	<u> \$.00</u>
TOTAL THIS INVOICE	\$ 169.00

Lloyd Gosselink Rochelle & Townsend, P.C.

Monarch Utilities I LP
 2020 Rate Case
 I.D.3176-24-RLT

August 14, 2019
 Invoice: 97503015

PROFESSIONAL SERVICES RENDERED

Date	Atty	Description Of Services Rendered	Hours
7/31/19	HEC	Travel to Central Records at the Public Utility Commission to inspect records pertaining to CCN 12983; case management.	1.30

TOTAL PROFESSIONAL SERVICES **\$ 169.00**

SUMMARY OF PROFESSIONAL SERVICES

Name	Staff Level	Hours	Rate	Total
Hanna E Campbell	Paralegal	1.30	130.00	169.00
TOTALS		1.30		\$ 169.00

TOTAL THIS INVOICE **\$ 169.00**



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November 13, 2019

Monarch Utilities I LP
 Attn William "Ken" Dix
 1325 North Grand Avenue Suite 100
 Covina, CA USA 91724

Invoice: 97505352
 Client: 3176
 Matter: 24
 Billing Attorney: RLT

INVOICE SUMMARY

For professional services and disbursements rendered through October 31, 2019:

RE: 2020 Rate Case

Professional Services	\$ 2,013.50
Total Disbursements	<u> \$.00</u>
TOTAL THIS INVOICE	\$ 2,013.50

Lloyd Gosselink Rochelle & Townsend, P.C.

Monarch Utilities I LP
2020 Rate Case
I.D.3176-24-RLT

November 13, 2019
Invoice: 97505352

PROFESSIONAL SERVICES RENDERED

Date	Atty	Description Of Services Rendered	Hours
10/09/19	RLT	Review documents regarding Tecon recovered from PUC files; research legislative history of TWC Section 13.145 (Administration).	1.60
10/09/19	HEC	Case management.	.80
10/10/19	HEC	Research legislative history of Texas Water Code 13.145 (Administration).	.10
10/14/19	RLT	Review Tecon's 2001 and 2004 rate applications (Administration).	1.40
10/16/19	HEC	Phone call with Public Utility Commission Central Records; email correspondences; phone call with T. Montes (Administration).	.20
10/22/19	HEC	Inspect CCN maps at the Public Utility Commission's Central Records; obtain copies of oversized maps related to CCN No. 11793 (Administration).	1.30
10/28/19	RLT	Review maps regarding Tecon's service area (Administration).	.30
10/30/19	RLT	Review new Cost Allocation Manual (Administration).	.80

TOTAL PROFESSIONAL SERVICES

\$ 2,013.50

SUMMARY OF PROFESSIONAL SERVICES

Name	Staff Level	Hours	Rate	Total
R Lambeth Townsend	Principal	4.10	415.00	1,701.50
Hanna E Campbell	Paralegal	2.40	130.00	312.00
TOTALS		6.50		\$ 2,013.50

TOTAL THIS INVOICE

\$ 2,013.50



816 Congress Avenue, Suite 1900
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December 16, 2019

Monarch Utilities I LP
 Attn William "Ken" Dix
 1325 North Grand Avenue Suite 100
 Covina, CA USA 91724

Invoice: 97505708
 Client: 3176
 Matter: 24
 Billing Attorney: RLT

INVOICE SUMMARY

For professional services and disbursements rendered through November 30, 2019:

RE: 2020 Rate Case

Professional Services	\$ 96.00
Total Disbursements	<u> \$.00</u>
TOTAL THIS INVOICE	\$ 96.00

Lloyd Gosselink Rochelle & Townsend, P.C.

Monarch Utilities I LP
 2020 Rate Case
 I.D.3176-24-RLT

December 16, 2019
 Invoice: 97505708

PROFESSIONAL SERVICES RENDERED

Date	Atty	Description Of Services Rendered	Hours
11/13/19	HEC	Phone call with B. Colvin, Public Utility Commission Central Records regarding inspecting records for Water CCN 12983 (Administration).	.10
11/27/19	RLT	Research affiliate transaction (Administration).	.20

TOTAL PROFESSIONAL SERVICES **\$ 96.00**

SUMMARY OF PROFESSIONAL SERVICES

Name	Staff Level	Hours	Rate	Total
R Lambeth Townsend	Principal	.20	415.00	83.00
Hanna E Campbell	Paralegal	.10	130.00	13.00
TOTALS		.30		\$ 96.00

TOTAL THIS INVOICE **\$ 96.00**



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January 17, 2020

Monarch Utilities I LP
 Attn William "Ken" Dix
 1325 North Grand Avenue Suite 100
 Covina, CA USA 91724

Invoice: 97506453
 Client: 3176
 Matter: 24
 Billing Attorney: RLT

INVOICE SUMMARY

For professional services and disbursements rendered through December 31, 2019:

RE: 2020 Rate Case

Professional Services	\$ 13.00
Total Disbursements	<u> \$.00</u>
TOTAL THIS INVOICE	\$ 13.00

Lloyd Gosselink Rochelle & Townsend, P.C.

Monarch Utilities I LP
 2020 Rate Case
 I.D.3176-24-RLT

January 17, 2020
 Invoice: 97506453

PROFESSIONAL SERVICES RENDERED

Date	Atty	Description Of Services Rendered	Hours
12/30/19	HEC	Phone call with B. Avila (PUC Central Records) to request inspection of records regarding CCN No. 12983 (Administration/Case Management).	.10

TOTAL PROFESSIONAL SERVICES **\$ 13.00**

SUMMARY OF PROFESSIONAL SERVICES

Name	Staff Level	Hours	Rate	Total
Hanna E Campbell	Paralegal	.10	130.00	13.00
TOTALS		.10		\$ 13.00

TOTAL THIS INVOICE **\$ 13.00**



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February 13, 2020

Monarch Utilities I LP
 Attn William "Ken" Dix
 1325 North Grand Avenue Suite 100
 Covina, CA USA 91724

Invoice: 97507625
 Client: 3176
 Matter: 24
 Billing Attorney: RLT

INVOICE SUMMARY

For professional services and disbursements rendered through January 31, 2020:

RE: 2020 Rate Case

Professional Services	\$ 2,305.50
Total Disbursements	<u>\$ 5.41</u>
TOTAL THIS INVOICE	\$ 2,310.91

Lloyd Gosselink Rochelle & Townsend, P.C.

Monarch Utilities I LP
2020 Rate Case
I.D.3176-24-RLT

February 13, 2020
Invoice: 97507625

PROFESSIONAL SERVICES RENDERED

Date	Atty	Description Of Services Rendered	Hours
1/03/20	HEC	Search for maps of Water CCN 12983 prior to 2003 at PUC Central Records (Administration).	4.30
1/07/20	RLT	Office conference with C. Faulk regarding status and tasks to be performed; review maps from Tecon files (Administration).	.50
1/07/20	HEC	Review CCN maps with L. Townsend and C. Faulk (Administration).	.10
1/15/20	RLT	Conference with H. Campbell and C. Faulk regarding Tecon records; review Tecon records (Administration).	1.50
1/15/20	WAF	Conference with H. Campbell and L. Townsend regarding Tecon records.	.40
1/15/20	HEC	Review documents discovered in PUC Central Records search with L. Townsend and C. Faulk (Administration).	.40
1/24/20	HEC	Review records at PUC Central Records regarding CCN 12983; obtain certified copies of records (Administration/Case Management).	3.00
1/27/20	WAF	Office conference with H. Campbell regarding research at PUC (Administration).	.20
1/28/20	HEC	Search for and obtain certified copies of order pertaining to CCN 12983 at PUC Central Records; email correspondence (Administration/Case Management).	1.50

TOTAL PROFESSIONAL SERVICES

\$ 2,305.50

SUMMARY OF PROFESSIONAL SERVICES

Name	Staff Level	Hours	Rate	Total
R Lambeth Townsend	Principal	2.00	435.00	870.00
William A Faulk III	Associate	.60	300.00	180.00
Hanna E Campbell	Paralegal	9.30	135.00	1,255.50
TOTALS		11.90		\$ 2,305.50

DISBURSEMENTS

Date	Description	Amount
	Copy Service	5.41

TOTAL DISBURSEMENTS

\$ 5.41

TOTAL THIS INVOICE

\$ 2,310.91



PUBLIC UTILITY OF COMMISSION OF TEXAS
RECEIPT

Date : 01/03/2020

Order : 2001011

Name : Lloyd Gosselink

Payment Type : Credit Card

Company : Lloyd,Gosselink

Address : 816 Congress Avenue, Suite 1900
Austin TX 78701

Phone :

Fax :

Qty	Product Description	Unit Price	Line Total
50	Interchange copies	\$0.10	\$5.00

Subtotal \$5.00

Total Tax \$0.41

Grand Total \$5.41

PUBLIC UTILITY COMM OF TX
1701 N CONGRESS
SUITE 8 100
AUSTIN, TX 78711
512-936-7180

PUBLIC UTILITY COMM OF TX
1701 N CONGRESS
SUITE 8 100
AUSTIN, TX 78711
512-936-7180

PUBLIC UTILITY COMM OF TX
0017340000802699124300

PUBLIC UTILITY COMM OF TX

Date: 01/03/2020 04:50:59 PM

Date: 01/03/2020 04:50:59 PM

CREDIT CARD SALE

CREDIT CARD SALE

VISA
CARD NUMBER: *****2516 K
TRAN AMOUNT: \$5.41
APPROVAL CD: 01776C
RECORD #: 000
CLERK ID: 655708

VISA
CARD NUMBER: *****2516 K
TRAN AMOUNT: \$5.41
APPROVAL CD: 01776C
RECORD #: 000
CLERK ID: 655708

Thank you!

X _____
(CARDHOLDER'S SIGNATURE)

Customer Copy

I AGREE TO PAY THE ABOVE TOTAL AMOUNT
ACCORDING TO THE CARD ISSUER AGREEMENT
(MERCHANT AGREEMENT IF CREDIT VOUCHER)

Thank you!

Merchant Copy



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March 11, 2020

Monarch Utilities I LP
 Attn William "Ken" Dix
 1325 North Grand Avenue Suite 100
 Covina, CA USA 91724

Invoice: 97508202
 Client: 3176
 Matter: 24
 Billing Attorney: RLT

INVOICE SUMMARY

For professional services and disbursements rendered through February 29, 2020:

RE: 2020 Rate Case

Professional Services	\$ 1,010.50
Total Disbursements	<u> \$.00</u>
TOTAL THIS INVOICE	\$ 1,010.50

Lloyd Gosselink Rochelle & Townsend, P.C.

Monarch Utilities I LP
2020 Rate Case
I.D.3176-24-RLT

March 11, 2020
Invoice: 97508202

PROFESSIONAL SERVICES RENDERED

Date	Atty	Description Of Services Rendered	Hours
2/04/20	WAF	Review PUC rate case precedent (Administration).	.80
2/04/20	JRB	Review Commission order from Docket 46245 for insights on handling of certain expenses (Administration).	.70
2/05/20	WAF	Review PUC rate case precedent (Administration).	.40
2/07/20	HEC	Search for records relating to CCN 12983 at PUC Central Records (Administration).	.70
2/13/20	HEC	Email correspondence and phone call with B. Avila (PUC Central Records) (Administration/Case Management).	.10
2/27/20	RLT	Conference with C. Faulk and R. Barnes regarding preparation of application and strategy (Administration).	.50
2/27/20	WAF	Office conference with L. Townsend and R. Barnes regarding rate case strategy and preparation (Administration).	.50

TOTAL PROFESSIONAL SERVICES

\$ 1,010.50

SUMMARY OF PROFESSIONAL SERVICES

Name	Staff Level	Hours	Rate	Total
R Lambeth Townsend	Principal	.50	435.00	217.50
William A Faulk III	Associate	1.70	300.00	510.00
J Reid Barnes	Associate	.70	250.00	175.00
Hanna E Campbell	Paralegal	.80	135.00	108.00
TOTALS		3.70		\$ 1,010.50

TOTAL THIS INVOICE

\$ 1,010.50



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April 14, 2020

Monarch Utilities I LP
 Attn William "Ken" Dix
 1325 North Grand Avenue Suite 100
 Covina, CA USA 91724

Invoice: 97509660
 Client: 3176
 Matter: 24
 Billing Attorney: RLT

INVOICE SUMMARY

For professional services and disbursements rendered through March 31, 2020:

RE: 2020 Rate Case

Professional Services	\$ 386.00
Total Disbursements	<u> \$.00</u>
TOTAL THIS INVOICE	\$ 386.00

Lloyd Gosselink Rochelle & Townsend, P.C.

Monarch Utilities I LP
2020 Rate Case
I.D.3176-24-RLT

April 14, 2020
Invoice: 97509660

PROFESSIONAL SERVICES RENDERED

Date	Atty	Description Of Services Rendered	Hours
2/27/20	JRB	Conference with L. Townsend and C. Faulk regarding preparation of rate application and strategy (Administration).	.50
3/23/20	RLT	Review correspondence; correspondence (Administration).	.60

TOTAL PROFESSIONAL SERVICES \$ 386.00

SUMMARY OF PROFESSIONAL SERVICES

Name	Staff Level	Hours	Rate	Total
R Lambeth Townsend	Principal	.60	435.00	261.00
J Reid Barnes	Associate	.50	250.00	125.00
TOTALS		1.10		\$ 386.00

TOTAL THIS INVOICE \$ 386.00



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May 15, 2020

Monarch Utilities I LP
 Attn William "Ken" Dix
 1325 North Grand Avenue Suite 100
 Covina, CA USA 91724

Invoice: 97510513
 Client: 3176
 Matter: 24
 Billing Attorney: RLT

INVOICE SUMMARY

For professional services and disbursements rendered through April 30, 2020:

RE: 2020 Rate Case

Professional Services	\$ 6,192.50
Total Disbursements	<u> \$.00</u>
TOTAL THIS INVOICE	\$ 6,192.50

Lloyd Gosselink Rochelle & Townsend, P.C.

Monarch Utilities I LP
2020 Rate Case
I.D.3176-24-RLT

May 15, 2020
Invoice: 97510513

PROFESSIONAL SERVICES RENDERED

Date	Atty	Description Of Services Rendered	Hours
4/02/20	WAF	Teleconference with B. Bahr regarding rate case preparation and witnesses (Administration).	.10
4/15/20	RLT	Research potential consultants for rate case (Administration).	1.40
4/17/20	RLT	Review correspondence regarding preparation of rate application; research regarding consulting experts; telephone conference with B. Bahr; correspondence (Administration).	2.30
4/17/20	WAF	Review and draft correspondence; review possible expert witness testimony; review Class A Rate Filing Package instructions; teleconference with B. Bahr regarding outstanding testimony issues (Administration).	1.10
4/20/20	RLT	Conference call with J. McIntyre, B. Bahr, and C. Faulk regarding preparation of application; follow-up tasks after call; correspondence; telephone conference with D. Watson; telephone conference with B. Bahr; prepare engagement letter for D. Watson; review and transmit document regarding Tecon's 2001 rate case (Administration).	4.50
4/20/20	WAF	Teleconference with B. Bahr, J. McIntyre, and L. Townsend regarding witness preparation; review correspondence; review prior testimony (Administration).	1.10
4/20/20	HEC	Discuss historical TCEQ documents obtained from Central Records with project team; review same; case management (Administration).	.90
4/21/20	RLT	Review correspondence; correspondence (Administration).	.40
4/21/20	HEC	Review correspondence (Administration).	.10
4/22/20	RLT	Review correspondence; correspondence; prepare engagement letter for expert (Administration).	.50
4/22/20	WAF	Review correspondence regarding retention of experts (Administration).	.20
4/22/20	JRB	Review rate filing package instructions for Class A utilities; review testimony, schedules, and workpapers filed in last full rate case in preparation for receiving client's initial drafts of the same for 2020 rate case (Administration).	2.00
4/23/20	RLT	Review correspondence; correspondence (Administration).	.60
4/23/20	WAF	Review correspondence related to expert retention; review prior Fairchild testimony; attend to expert witness issues (Administration).	.90
4/23/20	HEC	Review correspondence; case management (Administration).	.10
4/24/20	RLT	Review correspondence; prepare engagement letter for expert; correspondence (Administration).	.40
4/28/20	RLT	Telephone conference with B. Bahr; correspondence (Administration).	.30

TOTAL PROFESSIONAL SERVICES

\$ 6,192.50

SUMMARY OF PROFESSIONAL SERVICES

Name	Staff Level	Hours	Rate	Total
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Lloyd Gosselink Rochelle & Townsend, P.C.

Monarch Utilities I LP
 2020 Rate Case
 I.D.3176-24-RLT

May 15, 2020
 Invoice: 97510513

R Lambeth Townsend	Principal	10.40	435.00	4,524.00
William A Faulk III	Principal	3.40	300.00	1,020.00
J Reid Barnes	Associate	2.00	250.00	500.00
Hanna E Campbell	Paralegal	1.10	135.00	148.50
TOTALS		16.90		\$ 6,192.50

TOTAL THIS INVOICE

\$ 6,192.50



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June 11, 2020

Monarch Utilities I LP
 Attn William "Ken" Dix
 1325 North Grand Avenue Suite 100
 Covina, CA USA 91724

Invoice: 97511160
 Client: 3176
 Matter: 24
 Billing Attorney: RLT

INVOICE SUMMARY

For professional services and disbursements rendered through May 31, 2020:

RE: 2020 Rate Case

Professional Services	\$ 5,758.50
Total Disbursements	<u>\$ 7,332.50</u>
TOTAL THIS INVOICE	\$ 13,091.00

Lloyd Gosselink Rochelle & Townsend, P.C.

Monarch Utilities I LP
2020 Rate Case
I.D.3176-24-RLT

June 11, 2020
Invoice: 97511160

PROFESSIONAL SERVICES RENDERED

Date	Atty	Description Of Services Rendered	Hours
5/01/20	RLT	Conference call with rate case team, B. Fairchild, and D. Watson regarding preparation of application; gather information for consultants; review correspondence; review Monarch's audited financial statement; review and revise draft shell for testimony (Testimony Preparation).	3.70
5/01/20	WAF	Teleconference with B. Fairchild and Monarch Rate Case Team regarding testimony preparation; teleconference with D. Watson and Monarch Rate Case Team regarding testimony preparation; teleconference with Monarch Rate Case Team regarding case preparation and STMs; work on draft testimony shells for Fairchild and Watson. (Testimony Preparation).	4.10
5/01/20	JRB	Teleconference with B. Fairchild and rate case team regarding testimony; teleconference with D. Watson and rate case team regarding testimony; teleconference with Monarch rate case team regarding upcoming rate case and pending STM applications; review draft testimonies and further correspondence with rate case team regarding same. (Testimony Preparation)	2.70
5/01/20	HEC	Review correspondence; case management; research support for C. Faulk (Administration).	.20
5/04/20	RLT	Review correspondence regarding Inverness. (Administration)	.20
5/05/20	RLT	Review correspondence; research question asked; conference with C. Faulk; correspondence (Administration).	.70
5/08/20	RLT	Telephone conference with G. Freitag (Administration).	.20
5/14/20	RLT	Review correspondence; prepare form for tracking rate case expenses (Administration).	.20
5/14/20	HEC	Draft rate case expense tracking sheet; discuss rate case expense tracking with project team (Administration/Case Management).	.60
5/19/20	RLT	Review correspondence (Administration).	.20
5/19/20	HEC	Review correspondence; case management (Administration/Case Management).	.10
5/26/20	RLT	Review correspondence; correspondence. (Administration)	.30
5/26/20	WAF	Review and draft correspondence. (Administration).	.10
5/26/20	JRB	Review initial rate case documents and testimony shells; correspondence with B. Bahr regarding same. (Case Management)	.70
5/26/20	HEC	Review correspondence; case management (Administration/Case Management).	.10
5/27/20	RLT	Review correspondence; review application preparation meeting information; conference call with rate application team regarding preparation of application. (Preparation of Application).	1.40
5/27/20	WAF	Teleconference with Rate Case Team regarding testimony preparation. (Preparation of Application).	1.20
5/27/20	JRB	Weekly call with Monarch rate case team discussing preparation and schedule for filing same. (Preparation of Application).	.50
5/27/20	HEC	Review correspondence; case management (Administration/Case Management).	.10

Lloyd Gosselink Rochelle & Townsend, P.C.

Monarch Utilities I LP
2020 Rate Case
I.D.3176-24-RLT

June 11, 2020
Invoice: 97511160

Date	Atty	Description Of Services Rendered	Hours
5/28/20	HEC	Review correspondence; case management (Administration/Case Management).	.10

TOTAL PROFESSIONAL SERVICES **\$ 5,758.50**

SUMMARY OF PROFESSIONAL SERVICES

Name	Staff Level	Hours	Rate	Total
R Lambeth Townsend	Principal	6.90	435.00	3,001.50
William A Faulk III	Principal	5.40	300.00	1,620.00
J Reid Barnes	Associate	3.90	250.00	975.00
Hanna E Campbell	Paralegal	1.20	135.00	162.00
TOTALS		17.40		\$ 5,758.50

DISBURSEMENTS

Date	Description	Amount
5/31/20	Alliance Consulting Voucher # - 000105131 Alliance Consulting Group, Consultant Services, Professional services for May 2020 regarding Monarch Utilities 2020 Rate Case, 05/31/2020	7,332.50

TOTAL DISBURSEMENTS **\$ 7,332.50**

TOTAL THIS INVOICE **\$ 13,091.00**



Mr. Lambeth Townsend
Lloyd Gosslink Attorneys at Law
ltownsend@lglawfirm.com

June 7, 2020

RE: Monarch Utilities 2020 Rate Case

Dear Lambeth:

Attached is the prior month's invoice for Alliance Consulting Group's work in the 2020 Monarch Utilities 2020 Rate Case.

It is a pleasure to work with you on this project. If you have any questions related to this invoice, please call me at (214) 473-6771.

Sincerely,

A handwritten signature in cursive script that reads "Dane Watson".

Dane Watson

Invoice

101 E. Park Blvd., Suite 220
Plano, TX 75074

Date	Invoice #
05/31/2020	20-0514

Bill To:

Lambeth Townsend
Lloyd Gosslink Attorneys at Law
ltownsend@lglawfirm.com

Billing Period: 5-1-20 through 5-31-20

Terms		MON2020	
Net 30 Days		Monarch Utilities 2020 Rate Case	
Hours	Description	US Rate	US Amount
0.50	Dane Watson	\$ 270.00	\$ 135.00
33.50	Karen Ponder	\$ 195.00	\$ 6,532.50
9.50	Alan Ponder	\$ 70	\$ 665.00
			\$ -
	Subtotal - All Professional Services		\$ 7,332.50
		Total	\$ 7,332.50

ALLIANCE CONSULTING GROUP
Professional Services
May-20
Dane Watson
Monarch 2020

<u>Date</u>	<u>Time: Hours</u>	<u>Activity</u>
01-May	0.50	Kickoff call
02-May		
03-May		
04-May		
05-May		
06-May		
07-May		
08-May		
09-May		
10-May		
11-May		
12-May		
13-May		
14-May		
15-May		
16-May		
17-May		
18-May		
19-May		
20-May		
21-May		
22-May		
23-May		
24-May		
25-May		
26-May		
27-May		
28-May		
29-May		
30-May		
31-May		
Total	<u>0.50</u>	

ALLIANCE CONSULTING GROUP

Professional Services

May-20

Karen Ponder

Monarch Utilities

<u>Date</u>	<u>Time: Hours</u>	<u>Activity</u>
01-May	2.00	Review Staff testimony
02-May		
03-May		
04-May	2.00	Review last study by AUS
05-May		
06-May		
07-May		
08-May		
09-May		
10-May		
11-May		
12-May		
13-May		
14-May	2.00	Draft testimony
15-May		
16-May		
17-May		
18-May	3.00	Review provided data
19-May	7.00	Code Retirement Data
20-May	6.00	Begin actuarial build
21-May	6.00	Organize Actuarial data
22-May	3.50	Draft testimony
23-May		
24-May		
25-May	2.00	Review preliminary actuarial results
26-May		
27-May		
28-May		
29-May		
30-May		
31-May		
Total	<u>33.50</u>	

ALLIANCE CONSULTING GROUP

Professional Services

May-20

Alan Ponder

Monarch

<u>Date</u>	<u>Time:</u> <u>Hours</u>	<u>Activity</u>
01-May		
02-May		
03-May		
04-May		
05-May		
06-May		
07-May		
08-May		
09-May		
10-May		
11-May		
12-May		
13-May		
14-May		
15-May		
16-May		
17-May		
18-May		
19-May		
20-May		
21-May		
22-May		
23-May		
24-May		
25-May	8.00	Actuarial Runs
26-May	1.50	Actuarial Runs
27-May		
28-May		
29-May		
30-May		
31-May		
Total	<u>9.50</u>	

FINANCIAL CONCEPTS AND APPLICATIONS, INC.
3907 RED RIVER
AUSTIN, TEXAS 78751

(512) 458-4644

fincap2@texas.net
Fax (512) 458-4768

June 25, 2020

Mr. Lambeth Townsend
Lloyd Gosselink
816 Congress Avenue
Suite 1900
Austin, Texas 78701

Reference No.: 02110
Taxpayer ID No.: 74-2058652

Consulting Services:

Research, Analysis, and Preparation of
Testimony re: Rate of Return for Monarch
Utilities before the Public Utility Commission of
Texas.

For the Period:
Through June 25, 2020

Professional Time:

Bruce H. Fairchild
32.0 hours @ \$ 450 \$ 14,400

Total

\$ 14,400

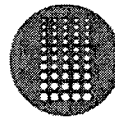


Bruce H. Fairchild

BRUCE H. FAIRCHILD

FINCAP, INC.
TIME LOG FOR MONARCH

Month	Date	Description	Time
2020			
May	1	Kick-off conference call with Monarch and attorneys	1.0
June	3	Review of materials and information provided by Monarch	0.5
	4	Call with BB regarding scheduling and testimony preparation	0.5
	8	Initial data collection for draft schedules	2.0
	13	Collection of data and preparation of draft schedules	1.5
	14	Preparation of draft schedules and testimony	5.5
	15	Preparation of draft schedules and testimony	4.0
	16	Completion of draft testimony	7.5
	17	Review of draft testimony and conference call with Monarch and attorneys	2.5
	19	Preparation of final draft schedules and testimony	4.5
	22	Conference call with Monarch and attorneys	1.0
25	Finalize schedules and testimony	1.5	
		Total	<u>32.0</u>



Monarch Utilities I L.P.

A SouthWest Water Company

12535 Reed Road
Sugar Land, TX 77478
TXCustomerCare@swwc.com
www.swwc.com

July 15, 2020

Dear Valued Customer:

I have been astounded by the resiliency of Texans during this extraordinary time. On behalf of all our employees, I want to thank you for doing your part—and for your words of support for our workers. We appreciate you very much. Today, I have some important information for you.

On July 15, 2020, Monarch Utilities I L.P. filed a request with the Public Utility Commission (PUC) for a rate review. You are receiving notice of this rate filing because you are a current Monarch Utilities customer, and we want to explain the need to adjust your rates from time to time—and answer questions you may have.

Staying safe and operational

As an essential service, water and wastewater utilities are vital to our lives. They are also the most expensive utilities to build and maintain. At home or in your place of business, you expect clean and safe water to always be available. But the process is far from simple. The resources that go into this often-unseen infrastructure and intensive water processing work are substantial. Over the past four years, Monarch Utilities has invested over \$35.1 million on system upgrades across the state to keep your water and wastewater systems safe.

This is how we act as stewards of safe water. We maintain and upgrade the infrastructure needed to keep water safe and flowing. Periodically, we must recoup those costs of capital improvements already made with rate adjustments. This keeps us in business to serve you.

How this affects your household

Spending more money on running your household is *never easy*. As many of us are at home more amidst the pandemic, expenses such as utilities and groceries have increased. We all understand that clean, readily available water is a big part of staying healthy, and we want that to be as cost-efficient as possible. Here is how you can expect your rates to change:

How much will my rates change?

For 81% of our water customers with a 5/8" meter, we are proposing a 3.92% increase to their monthly water bill for 5,000 gallons. Other customers will see their bills change by different percentages, and some changes will be phased in over a period of years.

For 98% of our wastewater customers with a 5/8" meter, we are proposing a 6.59% increase to their monthly wastewater bill for 5,000 gallons. Other customers will see their bills change by different percentages, and some changes will be phased in over a period of years.

Note that the rate adjustments will be different across Texas. Please review the attached tables to see the proposed rates and rate change comparisons for your service district.

When will my rates change?

As a result of legislation passed in the 2013 Texas legislative session, water and wastewater rate change requests go through a rigorous review process by the PUC. The Office of Public Utility Counsel (OPUC) represents customers like yourself in rate cases. A utility requests rates and those rates are ultimately set by the PUC. The review process could take up to 185 days.

We understand this will be an adjustment for you

We know this comes at a difficult time amidst a public health crisis and strained economic circumstances for many. I want you to know we have weighed these decisions carefully against the need to keep safe water coming to you via a system that is sustainable over the coming decades.

You should also know Monarch has not proposed a rate change in the past four years while still maintaining and upgrading your systems. When COVID-19 came to Texas, we suspended disconnections and late charges for nonpayment to ensure our customers had access to water and wastewater services. This was just one of the ways we worked to keep you safe.

I invite you to learn more about what it takes to protect and deliver water, as well as our community partnerships, as we move through this rate adjustment process at www.swwc.com.

Monarch will continue to maintain and improve your water and wastewater system to deliver to you, and the environment, the best possible water quality while remaining mindful of costs under our control.

Thank you for the opportunity to be your water and wastewater services provider.

Sincerely,



Jeffrey L. McIntyre
President
Monarch Utilities I L.P.

Enc: Notice of Proposed Rate Change

Attached is a copy of the Notice of Proposed Rate Change as required by the PUC. Please review this notice carefully, as it provides additional information about Monarch's request and the processing of our application by the PUC.

PUCT DOCKET NO. 50944

NOTICE OF PROPOSED RATE CHANGE
PURSUANT TO
TEXAS WATER CODE § 13.187

Monarch Utilities I L.P.

10983 and 20899

Company Name

CCN Number(s)

has filed a rate change application with the Public Utility Commission of Texas (Commission or PUCT). The application may be reviewed online at interchange.puc.texas.gov. You may also inspect a copy of the rate change application at your utility's office at the address below or at the Commission's office (1701 N. Congress Ave, Austin, TX 78701). The proposed rates will apply to service received after the effective date provided below, unless modified or suspended by the Commission. If the Commission receives a sufficient number of protests, separately or in a combined protest letter, from at least 2,946 ratepayers (10 percent of the utility's customers over whose rates the Commission has original jurisdiction) or from any affected municipality before the 91st day after the proposed effective date, the matter will be set for hearing. **See Protest Form on the next page for instructions on how to protest.**

EFFECTIVE DATE OF PROPOSED INCREASE: August 19, 2020

(must be at least 35 days after notice is provided to customers and 35 days after application is filed)

(Proposed rates requested by the utility are not final. The Commission may modify the rates and order a refund or credit against future bills all sums collected during the pendency of the rate proceeding in excess of the rate finally ordered plus interest.)

Reason(s) for Proposed Rate Change:

The main reason for the proposed rate change is to recover capital investments of over \$35.1 million Monarch has spent over the past four-and-a-half years to maintain and improve its systems in order to provide quality water and wastewater service to customers.

BILLING COMPARISON

Water

Existing	5,000 gallons: \$	<u>See</u>	/mo	Proposed	5,000 gallons: \$	<u>See</u>	/mo
Existing	10,000 gallons: \$	<u>Attached</u>	/mo	Proposed	10,000 gallons: \$	<u>Attached</u>	/mo

Water – Pass Through Charges

Existing	5,000 gallons: \$	<u>See</u>	/mo	Proposed	5,000 gallons: \$	<u>See</u>	/mo
Existing	10,000 gallons: \$	<u>Attached</u>	/mo	Proposed	10,000 gallons: \$	<u>Attached</u>	/mo

Sewer

Existing	5,000 gallons: \$	<u>See Attached</u>	/mo	Proposed	5,000 gallons: \$	<u>See Attached</u>	/mo
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Please see attached list of subdivisions and systems affected.

Subdivision(s) or System(s) Affected by Rate Change

<u>12535 Reed Rd.</u>	<u>Sugar Land</u>	<u>TX</u>	<u>77478</u>
Company Address	City	State	Zip

(866) 654-7992
Company Phone Number

<u>\$3,329,311</u>	<u>(\$816,717)</u>	<u>\$653,549</u>
Water Annual Revenue Increase	Water Pass-Through Annual Revenue Increase	Sewer Annual Revenue Increase

<u>July 15, 2020</u>	<u>See Attached</u>
Date Current Rate Change Notice Delivered	Date of Last Rate Change

*Prior to providing notice, the utility shall file a request for the assignment of a docket number for the application.

PUCT DOCKET NO. 50944

RATEPAYER COMMENTS/REQUESTS TO INTERVENE

If you wish to PROTEST the proposed rate change, you must submit this form and 10 copies to:

**Filing Clerk
Public Utility Commission of Texas
1701 North Congress Avenue
P.O. Box 13326
Austin, Texas 78711-3326**

Unless protests are received from at least 10% of ratepayers or from any affected municipality, or the Commission Staff requests a hearing, no hearing will be held, and the rates will be effective as proposed.

CUSTOMER INFORMATION (to be completed by customers submitting protests)

First Name: _____ Last Name: _____

Phone Number: _____ Fax Number: _____

Email Address: _____

Address, City, State: _____

Location where service is received: _____
(if different from the mailing address)

Please fill out the following:

I wish to PROTEST the following proposed rate action/s:

I wish to be a COMMENTER. I understand that: I am NOT a party to this case; my comments are not considered evidence in this case; and I have no further obligation to participate in the proceeding. Public comments may help inform the PUCT of the public concerns and identify issues to be explored. Please provide comments below. Attach a separate page, if necessary.

I am requesting to INTERVENE in this proceeding. As an INTERVENOR, I understand that: I am a party to the case; I am required to respond to all discovery requests from other parties; I may be required to attend hearings, and if I file testimony, I may be cross-examined in the hearing; if I file any documents in the case, I must provide a copy to every other party in the case; and I acknowledge that I am bound by the Procedural Rules of the PUCT and the State Office of Administrative Hearings (SOAH).

Signature of Protestor: _____

Date: _____

**Si desea informacion en Espanol, puede llamar al
1-888-782-8477**

**Hearing- and speech-impaired individuals with text telephones may contact the PUCT's Customer Assistance Hotline
at
512-936-7136**

LIST OF MONARCH'S WATER SYSTEMS AND SUBDIVISIONS SERVED

County	Water Systems	PWS ID Number	Subdivisions
Bandera	Lake Medina Shores	0100037	Lakeshore Beach, Wharton Dock, Lake Medina Shores, Lake Point
Brazoria	Holiday Shores	0200029	Holiday Shores
Chambers	Tower Terrace	0360069	Houston Raceway Park, West Chambers County Estates, Tower Terrace
Denton	Denton Creek Estates	0610015	Denton Creek Estates, Aero Valley Airport
	Ponderosa Addition	6101075	Sunrise Circle Estates, Ponderosa, Wild West Addition,
	Stonecrest Estates	0610059	Stonecrest Estates,
	Wynwood Haven Estates Ridgecrest (Grayson)	0610037 0910035	Wynwood Haven, Estates, Snug Harbor Ridgecrest
Grayson	Rocky Point Estates	0910038	Glen Eden, Hiland Shores, Lakeview, Little Mineral MHP, Millers Estates, Oak Estates, Preston Cove, Preston Forest, Preston Oaks, Preston Point Bend, Ridgecrest, Van Antwerp
	Sherwood Shores	0910040	Hanna Cove Estates, Rocky Point Estates "B", Rock Point "A", Hanna Ranchettes
	Tanglewood-on-Texoma	0910052	Cedar Mills Estates, Hillcrest Shores, Wright Acres, Sherwood Shores Angler's Estates, Cedar Oak Hills, Eagle Chase, Fairway Hollow, Greenway Bend, Lakecrest Village, Mill Creek Homesites, Oak Meadow Estates, Paradise Cove, Russwood-on-the-Lake, Simmons Shores, Sunrise Circle, Tanglewood Hills, Tanglewood Resort, Cambridge Shores, Highport, Mill Creek Meadows
Harris	Villas of Willowbrook	1013599	Villas of Willowbrook
	Western Trails	1010230	Western Trails Subdivision
Hays	Plum Creek	1050028	Amberwood, Bootstring Farms, Branch View Addition, Buda Business Park, Casey-Kyle, Double R, Dove Hill Estates, Goforth Estates, Green Pastures, Interstate Business, Kyle Crossing-Home Depot, Park South, Pinafore Park, Rolling Hills Estates, South Buda Business Park, Two Way, Village at Buda, Indian Paintbrush, River Oaks Ranch
	River Oaks Ranch	1050099	
Henderson	Beachwood Estates	1070069	Brentwood Estates, Deep Water Estates, Forest Shores, Greenwood Cove, Hidden Harbor, Indian Oaks, Beachwood Estates, Oak Forest Estates, Pebble Beach, Seis Hombres, Spillview Acres, Three-Way View, Treasure Isle, Waterboard
	Briarwood Harbor	1070220	Briarwood Harbor
	Carolynn Estates / Pinnacle Club	1070106	Bluffview, Brushy Creek, Bushwacker Estates, Carolynn Estates, Enclave, Esquire Estates II, Green Acres, Hidden Hills Harbor, Hillside Acres, Lynn Creek Cove, Payne Springs Estates, Forest Glen, The Highlands at Cedar Creek Lake, Michael's Cove, Pinnacle Club
	Cherokee Shores	1070206	Allen Ranch, Carson Addition, Coleman Tract, La Martinique, Landmarck Passage, Manning Ranch, Robinson Tract (Country Estates), Taylor Tract, Waterfront Shores, Cherokee Shores
	Dal-High	1070159	Dal-High Addition
	Highsaw	1070124	Briarwood Bay, Coffee City*, Diamond Head Bay, Coffee Landing Addition, Fincastle Farms, Highsaw, Hillside Estates
	Lollipop Landing	1070039	Lollipop Landing
	Westwood Beach	1070085	Cooper Estates, Lakeway, Oak Trail Shores, Shiloh, Waterwood, Wildewood, Westwood Beach
Hood	Acton (Royal Oaks)	1110055	Acton Royal Oaks
	Comanche Cove	1110060	Heritage Heights, Scenic View, Comanche Cove
	Comanche Harbor	1110022	Comanche Point, Island Village, Ports O'Call, Comanche Harbor
	Granbury Acres	1110109	377 Sunset Strip, Granbury Acres
	Hideaway Bay Estates	1110002	Hideaway Bay
	Montego Bay Estates	1110044	Montego Bay
	Oak Trail Shores	1110004	Lake Granbury Estates, Oak Trail Plaza, Oak Trail Shores, Arrowhead Shores, Lake Granbury Harbor
	Rancho Brazos Western Hills Harbor	1110036 1110005	Rancho Brazos Western Hills Harbor, Whisperview Village, Kings Plaza
Johnson	Crowley One Acre	1260011	Blue Grass Estates, Crowley One Acre, Highcrest Estates, Skyline Ranch, Lakeside Estates, Lakeview Ranchettes
	Falcon Crest Addition	1260076	Falcon Crest Addition
	Metroplex Homesteads	1260074	Metroplex Homesteads, The Homesteads
	Nolan River Estates	1260099	Nolan River Estates
	Ridgecrest Estates (Johnson)	1260035	Misty Hollow, Ridgecrest
	Shaded Lane Estates	1260103	Shaded Lane Estates
	Southern Acres	1260094	Southern Acres
	Sundance Addition	1260025	Space Acres North, Space Acres, X-Cell Ranch Estates, Sundance
	Tex-Rides Fifth	1260037	Tex-Rides Fifth
	Triple H Estates	1260116	Triple H Estates
	Twin Creeks Addition	1260038	Rolling Acres, North Hills Estates, Twin Creeks Addition
	West Meadows West Park Village	1260063 1260077	West Meadows West Park Village
Liberty	Raywood	1460041	Raywood
Marion	Indian Hills Harbor	1580063	Indian Hills Harbor
	Pine Harbor	1580023	Pine Harbor
Matagorda	Camelot Forest	1610058	Camelot Forest
Medina	Lake Medina Shores	0100037	Holiday Villages of Medina, Lake Medina Shores
	Crystal Springs	1700331	Crystal Springs
	Decker Hills	1700386	Champions Glen, Decker Hills, Hidden Lake Estates, Inverness Crossing, Park Place

LIST OF MONARCH'S WATER SYSTEMS AND SUBDIVISIONS SERVED

County	Water Systems	PWS ID Number	Subdivisions
Montgomery	Hulon Lakes	1700014	Hilltop Village, Woodcreek Valley, Hulon Lakes
	Oak Woods	1700454	Oak Woods
	Serenity Woods	1700483	Pine Loch, Serenity Woods
Parker	Green Acres	1840120	Green Acres, Robertson Village
	Spanish Park Estates	1840026	Spanish Park Estates
	Western Lake Estates	1840014	Cedar Ridge (Formerly Ruby Ridge), Brazos Ridge Estates, Western Lake Estates
	Westview (Parker)	1840105	Westview
Polk	Chesswood	1870088	Chesswood
	Countrywood	1870138	Country Wood
	Garden Acres	1870160	Garden Acres
	Longhorn Valley	1870152	Longhorn Valley
	Oak Terrace Estates	1870055	Oak Terrace Estates
	Phillips Acres	1870146	Phillips Acres
San Jacinto	Pinwah Pines	1870130	Pinwah Pines
	Bluewater Cove	2040059	Bluewater Cove
	Cedar Valley	2040045	Cedar Valley
	Coldspring Terrace	2040031	Coldspring Terrace
	Governor's Point	2040008	Governor's Point
	Holiday Villages of Livingston	2040067	Hidden Coves, Holiday Village of Livingston, Palmetto Point
	Shepherd Hill Estates	2040061	Shepherd Hills Estates, Shepherd Ranch Estates
Smith	Lakeway Harbor	2120064	Lakeway Harbor
	Pine Trail Shores	2120035	Pine Trail Shores
Tarrant	Benbrook Hills	2200313	Benbrook Hills
	Markum Ranch Estates	2200281	Markum Ranch Estates
	Silver Saddle	2200299	Silver Saddle
	Westside Addition	2200079	Gun Club, Cabot Estates, Willow Creek Additions, Westside
Travis	Inverness Point Water System	2270102	Crosswind Hidden Hills, Inverness Point and Lakehurst.
Trinity	Harbor Point	2280035	Harbor Point
Van Zandt	Callender Lake	2340007	Callender Lake, Hickory Hills
Wise	Aurora Vista	2490051	Aurora Vista*
	Chisholm Hills	2490044	Chisholm Hills
	Coyote Ridge	2490053	Coyote Ridge
	Hills of Oliver Creek	2490046	Hills of Oliver Creek
	Las Brisas	n/a	Las Brisas Estates
	Sage Brush Estates	2490058	Sage Brush Estates
	Skyview Ranch	2490061	Skyview Ranch
	Windmill Trails	2490050	Windmill Trails
Wood	Holiday Villages of Fork	2500058	Holiday Villages of Fork
Bandera	Enchanted River	0100039	Enchanted River Estates
	River Bend	0100042	River Bend Estates
Bexar	Bavarian Hills	0150235	Bavarian Hills
	Coolcrest	0150046	Coolcrest
	Stage Coach	0150096	Stage Coach Hills
	Oaks North	0150135	Oaks North Mobile Home Estates
	Country Springs	0150421	Country Bend
Comal	Oaks Village North	0460037	Oaks Village North
	Rum Rock	0460211	Rum Rock Ranch
	Windmill/Kestrel	0460221	Kestrel Air Park, Windmill Ranch Subdivision
Gillespie	Oakview	0860107	Oakview
Guadalupe	Garden Oaks	0940030	Garden Oaks
Hays	Huntington	1050124	Huntington Estates
Kendall	Cascade	1300005	Cascade Mobile Home Park
	Platten Creek	1300035	Platten Creek
Kerr	Cedar Springs	1330019	Cedar Springs MHP
	Center Point	1330007	Center Point
	Heritage Park	1330080	Heritage Park
	Hills & Dales	1330030	Hills & Dales
	Oak Ridge Estates	1330134	Oak Ridge Estates
	Southern Hills	1330128	Southern Hills, Montebello Estates, Silver Creek
	Verde Park Estates	1330027	Verde Park Estates
	Vista Hills	1330169	Vista Hills
	Westwood	1330015	Westwood Park, Monarch Hills
	Winwood Oaks	1330141	Winwood Oaks
	Woodhaven MHP	1330024	Woodhaven MHP
Medina	Rocky Creek	1630038	Rocky Creek

* This subdivision is within the corporate limits of Coffee City who has surrendered utility rate jurisdiction.

** This subdivision is within the corporate limits of the City of Aurora who has surrendered utility rate jurisdiction.