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APPLICATION OF MONARCH UTILITIES I, L.P. FOR AUTHORITY TO CHANGE RATES BEFORE THE STATE OFFICE
OF
ADMINISTRATIVE HEARINGS



REDACTED

DIRECT TESTIMONY

OF

CHRIS EKRUT

ON BEHALF OF THE
OFFICE OF PUBLIC UTILITY COUNSEL

October 20, 2020

SOAH DOCKET NO. 473-20-4709.WS PUC DOCKET NO. 50944

REDACTED DIRECT TESTIMONY OF CHRIS EKRUT

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ACRONYMS AND ABBREVIATIONS

ALJ – Administrative Law Judge

AWWA - American Water Works Association

CWIP – Construction Work in Progress

FIT - Federal Income Tax

GCD – Groundwater Conservation District

HR - Human Resources

O&M – Operations and Maintenance

OPUC - Office of Public Utility Counsel

PUCT – Public Utility Commission of Texas

RFI – Request for Information

RFP - Rate Filing Package

SAWS - San Antonio Water System

SOAH – State Office of Administrative Hearings

TAC – Texas Administrative Code

TCEQ - Texas Commission on Environmental Quality

TWC - Texas Water Code

1 T. WITNESS IDENTIFICATION AND SCOPE OF TESTIMONY 2 Q. PLEASE STATE YOUR NAME, OCCUPATION, AND BUSINESS ADDRESS. 3 A. My name is Chris Ekrut. I am a Director and Chief Financial Officer for NewGen Strategies & Solutions, LLC ("NewGen"). My business address is 275 W. Campbell Rd., 4 5 Ste. 440, Richardson, Texas 75080. 6 Q. **PLEASE** OUTLINE YOUR **EDUCATIONAL** AND **PROFESSIONAL** 7 BACKGROUND. 8 A. My educational and professional background are outlined in my professional resume, 9 herein included as Attachment CDE-A. WHAT DOES YOUR WORK WITH NEWGEN ENTAIL? 10 Q. I provide a broad range of consulting services, including, but not limited to: 11 A. 12 Cost of service and rate design studies 13 Litigation support 14 System valuations 15 Operational and organization studies 16 Socioeconomic impact analysis 17 Business Plan development Program / Project Management 18 ON WHOSE BEHALF ARE YOU TESTIFYING IN THIS PROCEEDING? 19 Q.

I am testifying on behalf of the Office of Public Utility Counsel ("OPUC").

COMMISSION OF TEXAS ("PUCT" OR THE "COMMISSION")?

HAVE YOU PREVIOUSLY TESTIFIED BEFORE THE PUBLIC UTILITY

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A.

O.

1	A.	Yes. I have submitted written direct testimony before the PUCT and the Texas
2		Commission on Environmental Quality ("TCEQ"). Attachment CDE-B is a copy of my
3		testifying record. Additionally, Attachment CDE-A contains a list of the contested cases
4		in which I participated but did not submit testimony.
5	Q.	WHAT IS THE PURPOSE OF YOUR TESTIMONY IN THIS PROCEEDING?
6	A.	The purpose of my testimony is to provide my recommendations with respect to the
7		reasonableness of Monarch Utilities I, L.P.'s requested increase in water rates and
8		wastewater rates specific to the Test Year ending September 30, 2019. Please note that I
9		refer to Monarch Utilities I, L.P. herein interchangeably as "Monarch" or the "Company."
10	Q.	PLEASE SUMMARIZE YOUR RECOMMENDATIONS.
11	A.	My recommendations are summarized as follows:
12		Adjustments should be made to the Company's requested level of operating and
13		maintenance ("O&M") expenses to:
14		o remove purchased water and purchased wastewater treatment expense from
15		the base rate revenue requirement;
16		o remove unfilled positions from Test Year personnel-related expenses from
17		the base rate revenue requirement;
18		o reflect a level of advertising expense that is allowable under the
19		Commission's rules; and
20		o remove expenses which are unreasonable, unnecessary, and not in the
21		public interest nor used and useful in the provision of service to ratepayers
22		from the base rate revenue requirement.

I	• A	djustments should be made to the Company's proposed level of rate base to
2	re	emove the requested level of construction work in progress ("CWIP").
3	• F	low-through adjustments associated with my recommendations should be
4	re	ecognized specific to Return on Investment and Federal Income Taxes ("FIT").
5	• T	he Company's requested water rates should be reduced to reflect my proposed
6	ac	djustments to overall revenue requirements. Further, the Company's requested
7	W	rater volumetric base rate water design should be amended to ensure higher
8	Ve	olume water users do not see a decrease in their monthly bills. Finally,
9	ac	djustments should be made to the Company's proposed rate phase-in methodology
10	to	account for previously approved rate phase-ins in prior PUCT proceedings.
11	• T	he Company's requested wastewater rates should be reduced to reflect my
12	pı	roposed adjustments to overall revenue requirements. Further, the Company's
13	re	equested wastewater rate design should be amended to maintain the fixed,
14	m	inimum charge at current levels and recover any additional revenue in the
15	V	olumetric charge.
16	• S _j	pecific to the Company's proposed tariff changes, adjustments should be made to:
17		o disallow the Company's requested change to consolidate all pass-through
18		charges and include purchased water and purchased wastewater treatment
19		expense within the base rate revenue requirement;
20		o adjust the Company's base rate revenue requirement to reflect the
21		Company's proposal concerning ownership of on-site pressure wastewater
22		units; and

1		o disallow the Company's proposed adjustments to tap fees until the
2		Company is able to meet its required burden of proof for the requested
3		adjustments.
4		• Specific to rate-case expenses, to the extent internally identified expenses are
5		duplicative of the expense levels included in base rate revenue requirements, there
6		should be adjustments made to prevent double recovery. I also recommend that
7		recovery of rate-case expenses be allowed over a minimum of a 24-month period
8		reflective of the impact these surcharges will have on the Company's ratepayers,
9		particularly those that are already subject to a rate-case surcharge.
10		II. OPERATION AND MAINTENANCE ("O&M") EXPENSES
11	Q.	DO YOU RECOMMEND ADJUSTMENTS TO THE COMPANY'S REQUESTED
11 12	Q.	DO YOU RECOMMEND ADJUSTMENTS TO THE COMPANY'S REQUESTED O&M EXPENSES?
	Q.	
12		O&M EXPENSES?
12 13	A.	O&M EXPENSES? Yes.
12 13 14	A. Q.	O&M EXPENSES? Yes. WHAT IS THE BASIS FOR YOUR RECOMMENDED ADJUSTMENTS?
12 13 14 15	A. Q.	O&M EXPENSES? Yes. WHAT IS THE BASIS FOR YOUR RECOMMENDED ADJUSTMENTS? 16 Texas Administrative Code ("TAC") § 24.41(b) states, "Only those expenses that are
12 13 14 15 16	A. Q.	O&M EXPENSES? Yes. WHAT IS THE BASIS FOR YOUR RECOMMENDED ADJUSTMENTS? 16 Texas Administrative Code ("TAC") § 24.41(b) states, "Only those expenses that are reasonable and necessary to provide service to the ratepayers may be included in allowable
12 13 14 15 16	A. Q.	Yes. WHAT IS THE BASIS FOR YOUR RECOMMENDED ADJUSTMENTS? 16 Texas Administrative Code ("TAC") § 24.41(b) states, "Only those expenses that are reasonable and necessary to provide service to the ratepayers may be included in allowable expenses." Allowable expenses include, "[o]perations and maintenance expense incurred

1		outlined in 16 TAC § 24.41(b). Each of my recommended adjustments is discussed in
2		more detail below and are grouped by the issue identified.
3	Q.	PLEASE SUMMARIZE THE ISSUES YOU HAVE IDENTIFIED.
4	A.	I am recommending reductions to O&M expenses to address the following issues:
5		1) Commensurate with my later recommendation to deny the Company's proposed
6		changes to its pass-through charges, all purchased water and purchased wastewater
7		treatment expense should be removed from the base rate revenue requirement.
8		2) Personnel-related expense associated with positions unfilled at the end of the Test
9		Year, and remaining unfilled, should be removed from the base rate revenue
10		requirement.
11		3) Test Year expenditures for advertising expense should be adjusted to comply with
12		the Commission's rules.
13		4) Expenses which are unreasonable, unnecessary, and not in the public interest nor
14		used and useful in the provision of service to ratepayers should be disallowed.
15 16		a. Removal of Purchased Water and Purchased Wastewater Treatment Expense from Base Rate Revenue Requirement
17	Q.	PLEASE EXPLAIN YOUR EARLIER STATEMENT THAT ALL PURCHASED
18		WATER AND PURCHASED WASTEWATER TREATMENT EXPENSE SHOULD
19		BE DISALLOWED.
20	A.	As I will discuss later in my testimony, I recommend that the Company's requested changes
21		to its purchased water and purchased wastewater treatment pass-through charges be
22		disallowed. The Company is proposing that the Test Year amount of expense for the
23		purchased water and purchased wastewater treatment services be included in the base rate

1		revenue requirement, and only the incremental difference between this amount and the
2		actual expense be included in the pass-through charge. I disagree with the Company's
3		proposed change. To fully reflect the impact of my testimony, an O&M adjustment is
4		warranted to remove these expenses from the Company's base rate revenue requirement
5		since they will be recovered through the Company's pass-through charges.
6	Q.	PLEASE DISCUSS THE ADJUSTMENT TO O&M EXPENSES THAT IS NEEDED
7		TO REFLECT YOUR RECOMMENDATION CONCERNING PASS-THROUGH
8		CHARGES.
9	A.	As noted in Schedule II-D-1 of the Company's RFP, in Account 610, Purchased Water, the
10		Company has included total expense of \$3,117,159. Also, on this schedule in Account
11		710, Purchased Wastewater Treatment, the Company has included total expense of
12		\$245,660. Commensurate with my recommendation stated above and my testimony as
13		presented below, these amounts should be removed from O&M expenses and passed
14		through to ratepayers via the Company's currently approved pass-through charges.
15 16		b. Adjustments to Personnel-Related Expense Related to Unfilled Positions
17	Q.	YOU PREVIOUSLY STATED THAT THE COMPANY HAS REQUESTED THE
18		RECOVERY OF PERSONNEL-RELATED EXPENSE ASSOCIATED WITH
19		VACANT POSITIONS. HOW DOES THE COMPANY'S HEADCOUNT OF
20		EMPLOYEES REQUESTED IN ITS APPLICATION COMPARE WITH ITS
21		HISTORICAL LEVEL OF VACANT POSITIONS?

1	A.	According to the testimony of Company Witness Mr. Edward Taussig, Monarch has a total
2		headcount of employees. ² In the Company's Confidential Response to OPUC Request
3		for Information ("RFI") No. 1-21, included herein as Confidential Attachment CDE-C, Mr.
4		Taussig provided the employee headcount and number of positions filled, by month from
5		January 2018 through August 2020. As shown in this response, as of the end of the Test
6		Year, the Company maintained a headcount of employees, but only of these
7		positions were filled. A further examination of this response shows that the employee
8		headcount remains consistent in every month provided, but the number of filled positions
9		varies from a low of to a high of to a high of the lowever, over
10		the timeframe analyzed, the Company only averaged filled positions.
11	Q.	WITHIN THE APPLICATION, HOW MANY POSITIONS HAS THE COMPANY
12		INCLUDED WITHIN ITS REQUESTED LEVEL OF PERSONNEL-RELATED
13		EXPENSE RECOVERY?
14	A.	As noted in the Company's Confidential Highly Sensitive WP II-D-9.1.f.1, "
15		
16		
17		." While Monarch is requesting recovery of a headcount based on
18		employees, the Company's response to the RFI indicates that from January 2018 through
19		August 2020, the Company has never maintained its full employee headcount in filled
20		positions.

² Direct Testimony of Edward Taussig at 7:18.

Q. WHAT ARE YOU RECOMMENDING FOR THE COMPANY'S KNOWN AND

2 MEASUREABLE ADJUSTMENT TO PERSONNEL-RELATED EXPENSE?

1

3 As defined in the Class A Water and Wastewater Rate Filing Package, a "Known and A. Measurable" change should be "verifiable on the record as to amount and certainty of 4 effectuation. Reasonably certain to occur within 12 months of the end of the test year."³ 5 Based on Monarch's historical filled positions, the Company's ability to achieve its full 6 7 head count by December 2020 is clearly uncertain and does not meet the known and 8 measurable standard. Based on the Company's own responses to the RFI, as of August 2020, the Company only had of its positions filled.⁴ Throughout the months 9 10 subsequent to the Test Year end, Monarch had between to positions filled, with 11 positions open in August 2020. Although some of the unfilled positions as of the end of 12 the Test Year had been filled as testified by Company Witness Mr. Edward Taussig, 5 other 13 employees had left their employment with Monarch, leaving positions unfilled in August 14 2020. Given the uncertainty that Monarch will be able to achieve its full employee 15 headcount subsequent to August 2020, any known and measurable change permitted to 16 Test Year personnel-related expense should only encompass a number of filled positions 17 that are shown to be at a level that has been historically maintained by the Company. Given 18 that the August 2020 filled position count was the most recent employee information 19 provided by the Company, and that the number of employees shown to be on payroll in

³ Class A Water and Wastewater Utility Rate Filing Package at 10.

⁴ Monarch's Confidential Response to OPUC RFI No.1-21, Confidential Attachment OPUC 1-21. (See Attachment CDE-C).

⁵ Direct Testimony of Edward Taussig at 8:1-15.

I		August of 2020 is typical of the months subsequent to the Test Year end and representative
2		of the average number of filled positions going back to January 2018, I recommend that
3		the August 2020 payroll information be used to compute a known and measurable change
4		to Test Year end personnel-related expense.
5	Q.	WHAT ADJUSTMENTS MUST BE MADE TO BASE RATE REVENUE
6		REQUREMENTS TO REFLECT YOUR RECOMMENDATION TO
7		PERŠONNEL- RELATED EXPENSES?
8	A.	As demonstrated in Confidential Schedule CDE-1, I amended the Company's proposed
9		adjustment for full employee headcount. In total, an adjustment of (must be
10		made to overall O&M expense levels, with () of this amount allocated to water
11		and (allocated to wastewater based on the Company's proposed meter
12		equivalent-based allocation. The reduction in funded positions also reduces payroll taxes,
13		with an adjustment of () to water and () to wastewater.
14 15		c. Removal of Advertising Expense that is Inconsistent with the Commission's Rules
16	Q.	PLEASE EXPLAIN WHAT COMMISSION RULES GOVERN THE INCLUSION
17		OF ADVERTISING EXPENSE WITHIN TEST YEAR O&M EXPENSES.
18	A.	16 TAC §24.41(b)(1)(f) states, "actual test year expenditures for advertising, contributions,
19		and donations may be allowed as a cost of service provided that the total sum of all such
20		items allowed in the cost of service must not exceed three-tenths of 1.0% (0.3%) of the
21		gross receipts of the utility for services rendered to the public."
22	Q.	IS IT YOUR OPINION THAT THE COMPANY HAS INCLUDED ADVERTISING
23		EXPENSE WITHIN ITS TEST YEAR COST?

- 1 A. Yes.
- 2 Q. PLEASE EXPLAIN.
- 3 As shown in the RFP in WP II-D-4(W) and WP II-D-4(S), the Company has included Test A. Year O&M expense associated with Elizabeth Christian Public Relations. This expense is 4 5 a total of \$205,599, or \$180,927 and \$24,672 for water and wastewater, respectively. On 6 their website, it is noted that Elizabeth Christian Public Relations "is a full-service public 7 relations firm in Austin that builds brands and businesses by telling our clients' stories."6 8 On their website under services, they cite their provision of strategic public relations 9 campaigns which "motivate people to do what our clients need them to do – buy a product, go to an event, use a service." The Merriam-Webster dictionary defines advertising as 10 11 "the action of calling something to the attention of the public especially by paid announcements."8 Based on the plain reading of this definition, it is my opinion that the 12 13 services provided by Elizabeth Christian Public Relations represent advertising expense.
- 14 Q. HOW DOES THE TEST YEAR LEVEL OF ADVERTISING EXPENSE
 15 COMPARE TO THE LIMITATION CONTAINED IN THE COMMISSION'S
 16 RULES?
- A. As shown in the RFP at Schedule II-A-2.1, the Company's operating revenues in the Test Year were \$31,964,244, with further gains from the Disposition of Utility Property of \$14,423, resulting in gross receipts in the Test Year of \$31,978,667. 0.3% of this amount

⁶ https://www.echristianpr.com/.

⁷ https://www.echristianpr.com/services/strategic-public-relations-campaigns.

⁸ https://www.merriam-webster.com/dictionary/advertising?src=search-dict-hed.

1		is \$95,936. Based on this calculation, the requested advertising expense of \$205,599
2		should be reduced by \$109,663.
3	Q.	WHAT ADJUSTMENT TO O&M EXPENSES IS NEEDED TO INCORPORATE
4		YOUR RECOMMENDATION?
5	A.	After allocation, an adjustment of approximately (\$96,503) should be made to water O&M
6		expense and (\$13,160) to wastewater O&M expense.
7 8		d. Removal of Unreasonable and Unnecessary Expense Which is Not in the Public Interest
9	Q.	PLEASE EXPLAIN YOUR STATEMENT REGARDING EXPENSE THAT IS
10		UNREASONABLE, UNNECESSARY, OR NOT IN THE PUBLIC INTEREST.
11		PLEASE EXPLAIN THE BASIS FOR YOUR OPINION.
12	A.	My opinion is based on 16 TAC § 24.41(b)(2)(I) which states, "any expenditure found by
13		the commission to be unreasonable, unnecessary, or not in the public interest is not allowed
14		as a component of cost of service."
15	Q.	WHAT TYPES OF EXPENSES HAVE YOU IDENTIFIED WHICH YOU
16		BELIEVE ARE UNREASONABLE, UNNECESSARY, OR NOT IN THE PUBLIC
17		INTEREST?
18	A.	As shown in Attachment MSH-3 to the Direct Testimony of Company Witness Mr. Mujeeb
19		Hafeez, the Company incurred Test Year expense for its Parent Company Corporate
20		Function of \$12,312,184, of which the Executive Function accounted for \$3,675,923. As
21		shown on Schedule IV-12.1 of the RFP, 24.4% of this expense is ultimately allocated to
22		Monarch ratepayers within this proceeding.

1	In response to OPUC RFI No. 1-9, included herein as Attachment CDE-D, the
2	Company provided an itemized list of expenses associated with Meals on Premises, Meals
3	& Entertainment, Lodging Expense, Transportation Expense, and Other Travel Expense
4	for its Executive Function totaling \$141,876. While only a representative sample of
5	invoices supporting the itemized expenses were produced in discovery, a review of the
6	representative invoices shows expenses which are clearly not in the public interest. What
7	follows are just a few examples of expenses associated with the Executive Function and
8	allocated to Monarch, but which are not in the public interest, supporting invoices of which
9	I have included herein as Attachment CDE-E:
10	• The Company held an event at the Ritz-Carlton Golf Resort in Naples, Florida,
11	which included \$650.52 in expenses associated with the Tiburon Golf Club.
12	• Multiple flights that were expensed at the Corporate Level included premium cabin
13	upgrades.
14	Countless meal expenses, hotel bills, and general receipts expensed at the Corporate
15	Level included alcohol.
16	• A meal associated with Eddie V's Prime Seafood in Austin, Texas totaled
17	\$3,438.07, including both food and alcohol.
18	• A meal associated with the Ritz Carlton Golf Resort for 4 people totaled \$445.29 –
19	that is over \$100 per person for food and alcohol.
20	• A meal associated with Veritas Steak and Seafood in Sugar Land, Texas totaled
21	\$2,118.58, including both food and alcohol.

1		• Mini-bar expense of approximately \$32.70 was incurred by Richard Rich, Chief
2		Operating Officer of SouthWest Water Company ("SouthWest" or "SWWC").
3		Again, this is just an example from the representative sample of invoices produced by the
4		Company. None of these expenses were incurred in the direct provision of service to the
5		Company's ratepayers and all of these expenses represent superfluous or unnecessary
6		expenses which are associated with the pure comfort and convenience of SouthWest Water
7		Company employees. To the extent Monarch wishes to pay for or reimburse employees
8		for such luxuries, these expenses should be borne by the Company's investors, not its
9		ratepayers.
10	Q.	WHAT EXPENSES ARE YOU RECOMMENDING BE DISALLOWED BY THE
11		COMMISSION UNDER 16 TAC § 24.41(b)(2)(I)?
12	A.	As I previously stated, the Company only provided a representative sample of invoices
13		supporting the \$141,876 in expenses associated with the Executive Function. Given the
14		types of expenses found within this representative sample of invoices, and that the
15		Company has not met its burden of proof on the remaining expense not included within the
16		original representative sample of invoices, the Commission should remove the entire
17		amount of \$141,876 from the requested revenue requirement. After allocation to Monarch,
18		this would result in a reduction of approximately \$34,617 (\$141,876 * 24.4%) in O&M
19		expense included in Test Year revenue requirements, with \$30,463 allocated to water and
20		\$4,154 allocated to wastewater.
21		Should the Commission disagree with my initial recommendation and find that
22		some of the expense is justified, then I recommend that all expenses associated with Meals

1		(\$9,824.27) and Meals and Entertainment -related expense (\$24,646.56), as well as 50%			
2		of all other expenses associated with Lodging, Transportation, and "Other" expense			
3		(\$107,405.21 * 50%) be disallowed. After allocation to Monarch, this would result in a			
4		reduction of approximately \$19,750 (\$88,173 * 24.4%) in O&M expense included in Test			
5		Year revenue requirements. At this lower level of adjustment, \$17,380 would be allocated			
6		to water and \$2,370 to wastewater.			
7	Q.	YOU MENTION THE EXPENSES ABOVE ARE RELATED TO THE			
8		EXECUTIVE FUNCTION. ARE THERE OTHER CORPORATE OVERHEAD			
9		FUNCTIONS WHERE YOU HAVE IDENTIFIED SIMILAR TYPES OF			
10		EXPENSE?			
11	A.	Yes. In response to OPUC RFI No. 1-17, included herein as Attachment CDE-F, the			
12		Company provided invoices for HR-related education and other general and administrative			
13		costs. As shown in selected invoices, included herein as Attachment CDE-G, the Company			
14		paid for a Whale Watching and Dolphin Tour as a team-building activity and several meals,			
15		including food and alcohol.			
16	Q.	WHAT ARE YOU RECOMMENDING RELATED TO THESE IDENTIFIED			
17		EXPENDITURES?			
18	A.	These expenses are similar in nature to the expenses that I identified related to the executive			
19		function and none of these expenses were incurred in the direct provision of service to the			
20		Company's ratepayers. Additionally, all of these expenses represent superfluous or			
21		unnecessary expenses, which are associated with the pure comfort and convenience of			
22		SouthWest Water Company employees. The expenses, in question, total approximately			

1		\$1,361.69. After 24.4% is allocated to Monarch, that results in a total Test Year expense
2		of \$332.25. Of this amount, 88%, or \$292.38 should be deducted from water O&M
3		expense, while \$39.87 should be deducted from wastewater O&M expense.
4	Q.	HAVE YOU IDENTIFIED OTHER EXPENSES THAT ARE NOT IN THE PUBLIC
5		INTEREST?
6	A.	Yes. First, in response to OPUC RFI No. 1-10, included herein as Attachment CDE-H, the
7		Company provided representative sample invoices associated with Professional Legal fees
8		included within Test Year expense, which were allocated from the Parent Company to
9		Monarch. Within these expenses, samples of which are included herein as Attachment
10		CDE-I, the Company has included legal expenses associated with trademark prosecution.
11		While the overall expense is small, \$708 allocated to water and \$96 allocated to
12		wastewater, these expenses were not incurred as part of the Company's provision of service
13		to ratepayers, and the Company's ratepayers should not be asked to pay for expenses
14		associated with the Company's trademarks. This is a benefit solely to the Company's
15		shareholders and should not be included in base rates.
16		Second, in response to OPUC RFI No. 1-16, included herein as Attachment CDE-J,
17		the Company provided representative sample invoices associated with human resources
18		("HR") outside services expense. Within this response, the Company included an invoice
19		for Columbia University in the amount of \$40,416. Additional invoices for Columbia
20		University in the amount of \$38,416 and \$30,312 were provided in response to OPUC RFI
21		No. 1-17, included herein as Attachment CDE-F, related to HR-related education and other
22		general and administrative costs. Taken together, collectively shown herein as Attachment

1		CDE-K, this amounts to \$109,144 paid to Columbia University for what appears to be the			
2		same student, Chris Kroll, Director of Planning & Treasury at SouthWest Water Company			
3		for an executive MBA program. While this training may be beneficial to the individua			
4		employee, it does not result in improved levels of direct service provision to the Company's			
5		ratepayers - it would, however, benefit the Company from improved management, and			
6		ultimately, financial performance. If the Company desires to pay for someone's executive			
7		MBA program, that expense should be borne by the Company's shareholders, no			
8		ratepayers.			
9	Q.	WHAT ADJUSTMENTS MUST BE MADE TO REMOVE THE ABOVE			
10		IDENTIFIED EXPENSES?			
11	A.	As mentioned above, \$708 for water and \$96 for wastewater must be removed from			
12		allocated corporate overhead expense to remove the legal expenses associated with the			
13		Company's trademark prosecution.			
14		Specific to the Columbia University expense, this expense was incurred at the			
15		corporate overhead level and would be subject to the 24.4% allocation to Monarch			
16		resulting in total Test Year expense of \$26,631. 88% of this expense was assigned to water			
17		and 12% assigned to wastewater, resulting in adjustments of (\$23,435) and (\$3,196)			

applied to water and wastewater, respectively.

⁹ https://www.linkedin.com/in/chris-kroll-a610bb1/.

2	Q.	WHAT ADJUSTMENTS DO YOU RECOMMEND TO THE COMPANY'S				
3		REQUESTED LEVEL OF TEST YEAR INVESTED CAPITAL?				
4	A.	Specific to the Company's requested level of Test Year invested capital, I recommend that				
5		the Company's request for CWIP be disallowed.				
6	Q.	PLEASE EXPLAIN YOUR UNDERSTANDING OF THE COMPANY'S REQUEST				
7		TO INCLUDE CWIP WITHIN THE REQUESTED LEVEL OF TEST YEAR				
8		INVESTED CAPITAL.				
9	A.	According to the Direct Testimony of Company Witness Mr. Jeffrey McIntyre, Monarch				
10		is requesting inclusion of CWIP as of December 31, 2019 for projects that were ultimately				
11		completed five months after the conclusion of the Test Year. 10 According to the Direct				
12		Testimony of Company Witness Mr. Brian Bahr, the amount of CWIP for projects				
13	completed after the Test Year and that Monarch seeks to include in Test Year invested					
14		capital (i.e., Rate Base) is \$1,486,395.11				
15	Q.	WHAT COMMISSION RULES GOVERN THE INCLUSION OF CWIP IN				
16		INVESTED CAPITAL?				
17	A.	16 TAC § 24.41(c)(4) states:				
18 19 20 21 22		The inclusion of CWIP is an exceptional form of relief. Under ordinary circumstances, the rate base consists only of those items that are used and useful in providing service to the public. Under exceptional circumstances, the commission may include CWIP in rate base to the extent that the utility has proven that:				

INVESTED CAPITAL / RATE BASE

III.

¹⁰ Direct Testimony of Jeffrey McIntyre at 25:7-8.

¹¹ Direct Testimony of Brian Bahr at 13:9.

· 1		(A) the inclusion is necessary to the financial integrity of the utility; and					
2 3		(B) major projects under construction have been efficiently and prudently planned and managed. 12					
4	Q.	HAS THE COMPANY PROVIDED TESTIMONY REGARDING THE					
5		EXISTENCE OF EXCEPTIONAL CIRCUMSTANCES THAT SUPPORTS THE					
6		INCLUSION OF CWIP IN RATE BASE?					
7	A.	No. The Company has not identified exceptional circumstances that would support					
8		inclusion of CWIP within the Company's Test Year level of invested capital. However, I					
9		would also note that the Commission's rules state that under exceptional circumstances,					
10		the Commission may include CWIP in rate base. The existence of exceptional					
11		circumstances does not automatically result in the inclusion of CWIP in rate base, it is					
12		simply the threshold factor that the Commission must consider before it then further applies					
13		its judgement and discretion in allowing CWIP for inclusion in rate base.					
14	Q.	HAVE YOU IDENTIFIED ANY EXCEPTIONAL CIRCUMSTANCES THAT YOU					
15		BELIEVE THE COMMISSION SHOULD CONSIDER WHEN MAKING A					
16		DETERMINATION ON THE INCLUSION OF CWIP IN TEST YEAR INVESTED					
17		CAPITAL?					
18	A.	No. In my review of the Company's Application and RFP, I have not identified any facts					
19		that would deem this case or its circumstances to be "exceptional" so as to support the					
20		inclusion of CWIP in Test Year invested capital. As I stated above, the Company has not					

¹² 16 TAC § 24.41(c)(4).

1		met its burden on the threshold issue for inclusion of CWIP in rate base – no exceptional					
2		circumstances exist in this case which warrant the inclusion of CWIP in rate base.					
3	Q.	HAS THE COMPANY PROVIDED TESTIMONY REGARDING WHY THE					
4		INCLUSION OF CWIP IN TEST YEAR INVESTED CAPITAL IS NECESSARY					
5		TO THE FINANCIAL INTEGRITY OF THE UTILITY?					
6	A.	Yes. According to Company Witness Mr. Brian Bahr, "[d]isallowing Monarch's test year					
7		CWIP balance related to major projects already in service would fundamentally be a					
8		detriment to Monarch's ability to be made whole in terms of matching revenues with					
9		expenses, the use of a test year, and Monarch's ability to earn its Commission-approved					
10		return." ¹³ Mr. Bahr goes on to state that disallowance of CWIP in Test Year invested					
11		capital necessarily disallows prudently incurred Test Year costs, detrimentally affects					
12		Monarch's rate of return, and is thus detrimental to Monarch's financial integrity. 14					
13	Q.	DO YOU AGREE WITH COMPANY WITNESS MR. BRIAN BAHR THAT					
14		INCLUSION OF CWIP IN TEST YEAR INVESTED CAPITAL IS NECESSARY					
15		FOR MONARCH'S FINANCIAL INTEGRITY?					
16	A.	No.					
17	Q.	PLEASE EXPLAIN WHY YOU DISAGREE WITH COMPANY WITNESS MR.					
18		BRIAN BAHR'S ASSESSMENT.					

 $^{^{13}}$ Direct Testimony of Brian Bahr at 16:7-10.

¹⁴ *Id.* at 16:19–17:10.

Q.	ARE THERE MORE APPROPRIATE ALTERNATIVES TO INCLUDING CWIP
	CWIP should be disallowed for inclusion in Test Year invested capital.
	Company's financial integrity. The Company has not met its burden on this issue and
	in the Test Year of \$3,731,660 indicates that disallowing CWIP would not challenge the
	requested return. \$123,668 in overall return of CWIP for a Company that had net income
	requested return of \$8,748,014,17 the return on CWIP represents only 1.4% of the total
	approximately \$123,668 (\$1,486,395 * 8.32%). As compared with the Company's total
	requested rate of return (8.32%), 16 the annual return on the requested level of CWIP is
A.	Based on the Company's requested level of CWIP (\$1,486,395) ¹³ and the Company's

IN TEST YEAR INVESTED CAPITAL THAT THE COMMISSION COULD ADOPT IF MONARCH'S FINANCIAL INTEGRITY IS CAUSE FOR CONCERN? Yes. Given that the Company has not met its burden under 16 TAC § 24.41(c)(4) in that the Company has not shown exceptional circumstances exist to warrant CWIP in Test Year invested capital as a threshold matter, CWIP should not be included in Test Year invested capital. However, should the Commission be concerned about the Company's ability to attract capital or generate a specific dollar-threshold of return, the Commission could adjust the Company's overall requested rate of return, rather than include CWIP in Test Year invested capital. This adjustment would not violate the "used and useful" criterion related

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¹⁵ Direct Testimony of Brian Bahr at 13:9.

¹⁶ Direct Testimony of Bruce Fairchild at 8:6-7.

¹⁷ RFP, Schedule II-A.

1		to Test Year invested capital or the requirements of 16 TAC § 24.41(c)(4) governing					
2		inclusion of CWIP in Test Year invested capital.					
3	Q.	ARE YOU RECOMMENDING AN INCREASE IN THE COMPANY'S					
4		REQUESTED RATE OF RETURN COMMENSURATE WITH YOUR					
5		RECOMMENDATION TO DISALLOW CWIP?					
6	A.	No. Increasing the Company's overall rate of return is simply an alternative tool available					
7		to the Commission should a determination be made that the disallowance of CWIP would					
8		challenge the financial integrity of the Company.					
9	Q.	WHAT ADJUSTMENT IS NEEDED TO RECOGNIZE YOUR RECOMMENDED					
10		DISALLOWANCE OF CWIP?					
11	A. Invested capital should be reduced by \$1,288,520 specific to water and \$197,875 specific t						
12		to wastewater. There are also flow-through impacts of this adjustment to overall return					
13		and income tax levels, which I will discuss later in my testimony.					
14		IV. RETURN ON RATE BASE AND FEDERAL INCOME TAX					
15	Q.	ARE YOU RECOMMENDING CHANGES TO THE COMPANY'S					
16		CALCULATIONS CONCERNING OVERALL RETURN ON RATE BASE?					
17	A.	Specific to return on rate base, I recommend that any flow-through impacts of my					
18		recommended adjustments be considered in calculating the allowable return on rate base.					
19		For purposes of calculating this recommendation, I have maintained the Company's					
20		requested capital structure and overall rate of return. Company witness Mr. Bruce Fairchild					

1		testifies that the Company's requested rate of return of 8.32% "is based on capital structure					
2		ratios of 45.0% debt and 55.0% equity, a cost of debt of 6.26% and an ROE of 10.0%."18					
3		My use of the Company's capital structure and rate of return does not indicate my					
4		endorsement of the Company's proposal. I recognize that Commission Staff and other					
5		intervenors may propose other adjustments with which I may agree. The use of the					
6		Company's requested capital structure and rate of return is not necessarily reflective of the					
7		final cost of service that I would support in this proceeding and is used only for purposes					
8		of illustrating the flow-through impacts of my recommended adjustments.					
9	Q.	WHAT ARE THE FLOW-THROUGH IMPACTS OF YOUR RECOMMENDED					
10		ADJUSTMENTS ON RETURN ON RATE BASE AND FIT?					
11	A.	The flow-through impacts of my recommended adjustments to return on rate base and FIT					
12		are illustrated in my summary of overall revenue requirements as shown in Schedule					
13		CDE-2 and Schedule CDE-3, which are discussed further below.					
14		V. COST OF SERVICE SUMMARY					
15	Q.	HAVE YOU PREPARED SCHEDULES DEMONSTRATING YOUR OVERALL					
16		RECOMMENDED COST OF SERVICE?					
17	A.	Yes. Schedule CDE-2 presents my overall recommended cost of service and revenue					
18		requirements specific to water, while Schedule CDE-3 presents the same information					
19		specific to wastewater service. Please note that these schedules only demonstrate my					
20		proposed adjustments. Commission Staff and other intervenors may recommend other					

¹⁸ Direct Testimony of Bruce Fairchild at 8:7-8.

1		adjustments that I may also support, and these adjustments should be considered in			
2		determining the final cost of service and revenue requirements to be approved in this			
3		proceeding.			
4		VI. WATER RATE DESIGN			
5	Q.	PLEASE DESCRIBE THE COMPANY'S PROPOSED WATER RATE DESIGN.			
6	A.	At full implementation, the Company is proposing a two-part rate design consisting of a			
7		fixed charge, which increases commensurate with the size of the ratepayer's meter and a			
8		four (4) tier inclining block volumetric charge, which increases the charge per 1,000			
9		gallons as a ratepayer's usage increases. 19			
10	Q.	DO YOU AGREE WITH THE COMPANY'S PROPOSED WATER RATE			
11		DESIGN?			
12	A.	While I generally agree with the overall 2-part rate structure proposed by the Company,			
13		several adjustments should be made as follows:			
14		(1) Final rates approved in this proceeding should be adjusted to reflect any			
15		adjustments and disallowances made to Test Year revenue requirements.			
16		(2) The Company's volumetric rate design should be adjusted to ensure that ratepayers			
17		using excessive volumes of water do not experience a rate decrease.			
18		(3) The Company's proposed phase-in methodology should be adjusted to protect			
19		ratepayers from excessive rates.			

¹⁹ RFP, WP III.

1		(4) Should the Commission disagree with my proposed disallowance of the Company's					
2		requested changes to its pass-through charges, then the Commission should ensure					
3		that purchased water expenses are recovered through the volumetric base rate					
4	component.						
5		a. Adjustments to Rates to Reflect Disallowances					
6	Q.	HAVE YOU PREPARED WATER RATES THAT REFLECT YOUR					
7		RECOMMENDATIONS?					
8	A.	A. Yes. Schedule CDE-4 presents my recommended water rates, both under the Company'					
9		requested rate design, as well as under my alternative rate designs discussed below.					
10		b. Adjustments to Volumetric Water Rate Design					
11	Q.	PLEASE EXPLAIN YOUR RECOMMENDED ADJUSTMENT TO THE					
12		COMPANY'S VOLUMETRIC RATES.					
13	A.	A. Table 1 below presents the Company's current volumetric rates, the proposed volumetric					
14	rates, and the volumetric rates as of September 2021 associated with the Water Services,						
15	Inc. ("Water Services") and Diamond systems. Under the proposed rates, all Monarch						
16	ratepayers paying the current rates would see a reduction in their volumetric rate, and this						
17		reduction in volumetric rates would be even more pronounced for the users on the Water					
18		Services and Diamond systems.					

Table 1
Example Monthly Bills for Diamond Ratepayers

Rate Tier Monarch Monarch Water Services Dia					
Kate Hei	Current	Proposed	(Sept 2021)	(Sept 2021)	
0-2,000 gal	\$ 7.47	\$ 7.25	\$ 3.51	\$ 5.53	
2,001 – 10,000 gal	9.20	8.93	5.13	9.19	
10,001 – 20,000 gal	10.43	10.12	7.03	11.06	
20,001 gal +	11.11	10.78	11.24	14.78	

The effect of this reduction is that users who consume less water will see less of a percentage increase in their overall monthly bill than those who are higher water users. In fact, Monarch's own bill comparison²⁰ shows that existing Monarch ratepayers using 30,000 gallons will actually see a decrease in their monthly water bill. Table 2 below shows the ratepayer bill impact of this rate change for Monarch ratepayers using information from the Company's WP-III.

Table 2
Example Monthly Bill Impact for Monarch Ratepayers

	5,000 gallons	10,000 gallons	15,000 gallons	<u>30,000 gallons</u>
Current Bill	\$ 91.84	\$ 137.84	\$ 189.99	\$ 353.24
Proposed Bill	95.44	140.09	190.69	349.09
\$ Change	3.60	2.25	0.70	(4.15)
% Change	3.9%_	1.6%	0.4%	(1.2%)

An implementation of this proposed rate adjustment should not result in users whose water use is excessive receiving a reduction in their monthly bill. This does not promote water conservation or encourage continued efficient use of the state's limited water resources.

Q. WHAT CHANGES TO MONARCH'S PROPOSED RATES DO YOU

RECOMMEND SO THAT RATEPAYERS USING HIGHER LEVELS OF WATER

DO NOT EXPERIENCE A RATE DECREASE?

²⁰ RFP, WP-III.8.

A. At a minimum, the Company's volumetric rates should not be decreased. The Company's volumetric rates should remain as they are now, with adjustments made to the fixed, minimum charge to achieve the approved revenue requirement. Assuming the Company's requested water rate revenue requirement of \$34,518,576, this recommendation would reduce the Company's proposed fixed, minimum charge for a ratepayer with a 5/8-inch meter to \$53.00, as opposed to the Company's proposed rate of \$54.15. However, I would note that this rate is before any adjustments to the Company's revenue requirement are appropriately recognized and the fixed, minimum charge adjusted accordingly.

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Q. YOU STATE THAT YOUR RECOMMENDATION IS THE MINIMUM ADJUSTMENT THAT SHOULD BE MADE. DO YOU HAVE AN ALTERNATIVE RECOMMENDATION?

Yes. Should the Commission determine that the promotion of water conservation is a significant factor in setting rates for Monarch, then each rate tier should be set at the highest volumetric rate for that tier that is currently charged by Monarch to any system. This would keep Monarch's rates for the first three (3) rate blocks as they exist today and set the rate for consumption over 20,001 gallons of usage equivalent to the Diamond system rate as of September 2020. Table 3 below demonstrates this proposal.

Table 3
Alternative Volumetric Rate Structure to Encourage Water Conservation

Rate Tier	Monarch Current	Monarch Proposed	Alternative	Basis for Alternative Rate
0 - 2,000 gal	\$ 7.47	\$ 7.25	\$ 7.47	Current Monarch Rate
2,001 – 10,000 gal	9.20	8.93	9.20	Current Monarch Rate
10,001 – 20,000 gal	10.43	10.12	10.43	Current Monarch Rate
20,001 gal +	11.11	10.78	13.43	Current Diamond Rate

20 Q. WHAT IS THE IMPACT OF YOUR PROPOSAL ON THE COMPANY?

1	A.	This proposal would increase the revenue variability for the Company due to the impacts
2		of weather. Additionally, with the higher levels of volumetric pricing, water conservation
3		will be further incentivized. This will lead to potentially reduced usage and reduced
4		revenue generated by the Company in the volumetric charge.
5	Q.	IS THERE A WAY TO FACTOR THIS IMPACT INTO YOUR PROPOSED
6		ALTERNATIVE RATE DESIGN?
7	A.	Yes. In designing volumetric base rates, the anticipated volumes of usage can be adjusted
8		for the impact of price elasticity of demand, that is, the relationship between a change in
9		price as it results in a change in consumption. By assuming a lower level of consumption
10		in response to the change in price, a more accurate representation of revenue recovery in
11		the volumetric charge can be determined, with the remaining revenue requirement
12		recovered as part of the fixed, minimum charge.
13	Q.	HAVE YOU PREPARED AN EXAMPLE OF HOW THIS ELASTICITY
14		ANALYSIS COULD BE INCORPORATED INTO RATE DESIGN?
15	A.	Yes. An example of this type of analysis is presented in Schedule CDE-5, which illustrates
16		how elasticity can be incorporated into rate design to determine the estimated reduction in
17		consumption that may occur due to a change in rates.
18	Q.	HOW DID YOU DETERMINE THE OVERALL PRICE ELASTICITY OF
19		DEMAND INCLUDED IN YOUR ANALYSIS?
20	A.	The Texas Water Development Board conducted a study in 1999 to examine price elasticity
21		of demand specific to utilities in Texas ("Study"). As shown in Table 4-6 of this Study,

1		the composite, long-term price elasticity of demand was -0.21.21 In other words, for every
2		10% increase in price, consumption is reduced by 2.1%. For purposes of the analysis
3		presented in Schedule CDE-5, I have relied on this figure from the Study to estimate the
4		impact of price elasticity of demand of my alternative volumetric rate recommendation.
5	Q.	ASSUMING YOUR ABOVE ELASTICITY FIGURE AND PROPOSED
6		ALTERNATIVE VOLUMETRIC RATE DESIGN, WHAT IS THE ESTIMATED
7		IMPACT ON ESTIMATED CONSUMPTION?
8	A.	The impact of my proposed alternative volumetric rates and price elasticity of demand is
9		illustrated in Schedule CDE-5. As shown, I estimate that overall consumption would be
10		reduced by just under 88 million gallons (approximately 5.3%), resulting in estimated
11		volumetric rate revenues of \$14,349,013.
12	Q.	USING YOUR VOLUMETRIC RATE ANALYSIS ABOVE, WHAT IS THE
13		ESTIMATED IMPACT TO THE COMPANY'S FIXED, MINIMUM CHARGE?
14	A.	Assuming the Company's rate revenue requirement before adjustment of \$34,518,576,
15		Table 4 below illustrates my proposed alternative rate recommendation. Please note that
16		any adjustments approved by the Commission would serve to amend the fixed, minimum
17		charge. This is important inasmuch as my alternative rate recommendation, without

downward adjustment to the Company's revenue requirement, would result in an increase

in the fixed, minimum charge that is greater than what has been noticed to ratepayers.

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Water Price Elasticities for Single-Family Homes in Texas, August 1, 1999, Page 4-12. https://www.twdb.texas.gov/publications/reports/contracted_reports/doc/96483189.pdf.

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Table 4 Alternative Volumetric Rate Structure to Encourage Water Conservation

	Monarch Current	Monarch Proposed	Alternative 1 (No Change in Current Volumetric Rates)	Alternative 2 (Encouragement of Water Conservation)
Fixed, Minimum (5/8" Meter)	\$ 49.30	\$ 54.15	\$ 53.00	\$ 54.24
Volumetric Charge (per 1,000 gal)				
0 - 2,000 gal	\$ 7.47	\$ 7.25	\$ 7.47	\$ 7.47
2,001 - 10,000 gal	9.20	8.93	9.20	9.20
10,001 - 20,000 gal	10.43	10.12	10.43	10.43
20,001 gal +	11.11	10.78	11.11	13.43

c. Adjustments to Phase-In Methodology

4 Q. PLEASE EXPLAIN WHAT CONCERNS YOU HAVE REGARDING THE 5 COMPANY'S PROPOSED PHASE-IN METHODOLOGY.

In the Final Order in Docket No. 47736, ²² SWWC Utilities, Inc. DBA Water Services, Inc. 6 A. ("WSI")²³ received approval for phase-in rate changes in September 2021 for the Water 7 Services and Diamond systems. In reviewing the Company's proposed rate phase-in in the 8 current proceeding, which would occur after the already approved September 2021 rate 10 changes, the charges to ratepayers in some instances would decrease from these previously approved levels. In some instances, these decreases are extreme and could ultimately lead to confusion for ratepayers.

CAN YOU PROVIDE AN EXAMPLE OF THESE DECREASED FUTURE Q. **CHARGES?**

15 A. In Table 5 below, I have demonstrated the monthly bills for ratepayers on the Diamond 16 system as of September 2020, after the rate phase-in already approved for September 2021,

²² Application of SWWC Utilities, Inc. DBA Water Services, Inc. for Authority to Change Rates, Docket No. 47736, Final Order (Oct. 16, 2019).

²³ WSI refers to Water Services, Inc, SWWC Utilities, Inc. d/b/a Huntington Utility Company, LLC, SWWC Utilities, Inc. d/b/a Diamond Water Company, and Wiedenfeld Water Works, Inc.

and the consolidated rates requested by the Company in this proceeding. As illustrated, under the Company's proposal, charges to these ratepayers would increase in September 2021 before there is a tremendous downward adjustment in August of 2022. This could create significant confusion for ratepayers.

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Table 5
Example Monthly Bills for Diamond Ratepayers

Ratepayer Billed Usage	September 2020 (Approved in Docket 47736)	September 2021 (Approved in Docket 47736)	August 2022 (Company Proposal)
2,000 gallons	\$ 92.94	\$ 102.37	\$ 68.65
5,000 gallons	117.99	129.94	95.44
10,000 gallons	159.74	175.89	140.09

Q. ARE THERE OTHER SYSTEMS WITH PREVIOUSLY APPROVED RATE INCREASES THAT WILL BE IMPACTED BY THE COMPANY'S PROPOSED PHASE-IN IN THIS PROCEEDING?

Yes. The Water Services system is proposed to see a decrease in minimum charges, along with decreases to the highest volumetric tier, but increases in the first three (3) volumetric rate tiers. This will result in increased monthly bills from September 2021 through full phase-in for lower volume ratepayers, but decreased monthly bills from September 2021 through full phase-in for higher volume ratepayers. Please see Table 6 for a demonstration of these impacts.

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Table 6
Example Monthly Bills for Water Services Ratepayers

Ratepayer Billed Usage	September 2020 (Approved in Docket 47736)	September 2021 (Approved in Docket 47736)	August 2022 (Company Proposal)	August 2023 (Company Proposal)	August 2024 (Company Proposal)
2,000 gallons	\$ 60.74	\$ 64.56	\$ 65.92	\$ 67.29	\$ 68.65
5,000 gallons	75.20	79.95	69.20	70.61	72.01
10,000 gallons	99.30	105.60	100.74	101.10	101.47

1	Q.	DO THE COMMISSION'S RULES PROVIDE GUIDANCE ON THIS
2		SITUATION?
3	A.	Yes. 16 TAC § 24.75(b)(6) states:
4 5		A utility that requests and receives a phased or multi-step rate increase cannot apply for another rate increase during the period of the phase-in rate intervals unless:
6 7 8		(A) the utility can prove financial hardship; or(B) the utility is willing to void the next steps of the phase-in rate structure and undergo a full cost of service analysis.
9		In the instant case, the Company has only applied for future rate increases to occur after
10		the already approved phase-in. However, as shown above, due to a reduction in cost of
11		service to these systems associated with system consolidation, the phase-in of consolidated
12		rates will reduce monthly charges for some ratepayers above already approved levels.
13	Q.	WHAT IS YOUR RECOMMENDATION TO ADDRESS THESE ISSUES FOR
14		THE DIAMOND SYSTEM?
14 15	A.	THE DIAMOND SYSTEM? As contemplated in 16 TAC § 24.75(b)(6)(B), a utility can be expected to forgo a step
	A.	
15	A.	As contemplated in 16 TAC § 24.75(b)(6)(B), a utility can be expected to forgo a step
15 16	A.	As contemplated in 16 TAC § 24.75(b)(6)(B), a utility can be expected to forgo a step within a previously approved phase-in rate structure. Specific to the Diamond system, and
15 16 17	A.	As contemplated in 16 TAC § 24.75(b)(6)(B), a utility can be expected to forgo a step within a previously approved phase-in rate structure. Specific to the Diamond system, and as illustrated in Schedule CDE-6, the Company would experience an annualized water
15 16 17 18	A.	As contemplated in 16 TAC § 24.75(b)(6)(B), a utility can be expected to forgo a step within a previously approved phase-in rate structure. Specific to the Diamond system, and as illustrated in Schedule CDE-6, the Company would experience an annualized water revenue increase to the Diamond system of \$175,800 (approximately 10%) when the next
15 16 17 18 19	A.	As contemplated in 16 TAC § 24.75(b)(6)(B), a utility can be expected to forgo a step within a previously approved phase-in rate structure. Specific to the Diamond system, and as illustrated in Schedule CDE-6, the Company would experience an annualized water revenue increase to the Diamond system of \$175,800 (approximately 10%) when the next rate phase-in takes effect in 2021. However, this rate phase-in would implement rates that
15 16 17 18 19 20	A.	As contemplated in 16 TAC § 24.75(b)(6)(B), a utility can be expected to forgo a step within a previously approved phase-in rate structure. Specific to the Diamond system, and as illustrated in Schedule CDE-6, the Company would experience an annualized water revenue increase to the Diamond system of \$175,800 (approximately 10%) when the next rate phase-in takes effect in 2021. However, this rate phase-in would implement rates that would over-recover approximately \$466,803 (approximately 24%) above the annualized
15 16 17 18 19 20 21	A.	As contemplated in 16 TAC § 24.75(b)(6)(B), a utility can be expected to forgo a step within a previously approved phase-in rate structure. Specific to the Diamond system, and as illustrated in Schedule CDE-6, the Company would experience an annualized water revenue increase to the Diamond system of \$175,800 (approximately 10%) when the next rate phase-in takes effect in 2021. However, this rate phase-in would implement rates that would over-recover approximately \$466,803 (approximately 24%) above the annualized revenues produced under the Company's proposed final rates in the current proceeding.

1	Q.	TO BE CLEAR, UNDER YOUR RECOMMENDATION THE COMPANY WOULD
2		BE FOREGOING PREVIOUSLY APPROVED REVENUE RECOVERY FROM
3		THE DIAMOND SYSTEM?
4	A.	Yes, that is correct. However, the Company chose to proceed with consolidation of these
5		systems within this proceeding. This situation is the result of the Company's decision-
6		making to proceed with the consolidation, while rates are still being phased in as approved

7 in Docket No. 47736. Ratepayers should not be subjected to such variation in rates and monthly bills based solely on the decisions of the Company.

Q. WHAT IS YOUR RECOMMENDATION TO ADDRESS THESE ISSUES FOR THE WATER SERVICES SYSTEM?

Specific to the Water Services system, and as illustrated in Schedule CDE-7, the overall level of revenue recovery continues to increase across the various rate phase-in periods; however, the fixed, minimum charge decreases while the volumetric charges increase. In the interest of continuing to send a proper conservation signal and ensuring that those ratepayers at higher levels of usage receive the least benefit from the rate phase-in, I recommend that the Company's rate phase-in be restructured. Specifically, the Company should be ordered to immediately move to the final fixed, minimum charge in this proceeding and offer a restructured rate phase-in specific to the volumetric charges. The same approved levels of overall revenue could be used to determine the appropriate volumetric charges similar to what I have done in Schedule CDE-7. However, I would also note that the Commission's acceptance of my prior recommendations concerning

1		restructuring the Company's volumetric charges could impact the overall structure finally
2		approved for the Water Services system.
3		d. Recovery of Purchased Water Expense
4	Q.	PLEASE EXPLAIN YOUR UNDERSTANDING OF HOW THE COMPANY HAS
5		INCORPORATED PURCHASED WATER EXPENSE INTO ITS PROPOSED
6		WATER RATES.
7	A.	The Company is proposing to recover the cost of purchased water in its base rate as part of
8		the revenue requirement. To the extent incremental differences exist between this amount
9		and future actual cost, the incremental difference is proposed to be recovered in the
10		Company's proposed pass-through charges.
11	Q.	DOES YOUR TESTIMONY ADDRESS THESE PROPOSED PASS-THROUGH
12		CHARGES?
13	A.	Yes. My testimony addresses these issues in Section VIII.
14	Q.	IF THE COMMISSION ULTIMATELY DISAGREES WITH YOUR
15		RECOMMENDATION, DOES THAT HAVE AN IMPACT ON YOUR RATE
16		DESIGN RECOMMENDATIONS?
17	A.	Yes. If the Commission disagrees with my recommendations concerning the Company's
18		proposed pass-through charges and maintains recovery of purchased water expense within
19		base rates, then I recommend that this cost be fully recovered in the Company's volumetric
20		base rates.

1	Q.	PLEASE EXPLAIN THE BASIS FOR YOUR RECOMMENDATION TO
2		RECOVER THE COST OF PURCHASED WATER IN THE VOLUMETRIC BASE
3		RATE.
4	A.	I recommend that the cost of purchased water be recovered in the volumetric base rate to
5		continue to send a conservation signal to ratepayers. If purchased water cost is included in
6		the fixed, minimum base rate, then ratepayers are not incentivized to conserve since they
7		cannot impact their total monthly bill by using less water. Including purchased water cost
8		in the volumetric base rate sends the proper pricing signal to ratepayers and incentivizes
9		efficient water use.
10		VII. WASTEWATER RATE DESIGN
11	Q.	PLEASE DESCRIBE THE COMPANY'S PROPOSED WASTEWATER RATE
12		DESIGN.
13	A.	At full implementation, the Company is proposing a two-part rate design consisting of a
14		fixed charge which increases commensurate with the size of the ratepayer's meter and a
15		uniform volumetric charge per 1,000 gallons. ²⁴
16	Q.	DO YOU AGREE WITH THE COMPANY'S PROPOSED WASTEWATER RATE
17		DESIGN?
18	A.	While I generally agree with the overall 2-part rate structure proposed by the Company,
19		several adjustments should be made to the rate structure. First, final rates approved in this
20		proceeding should be adjusted to reflect any disallowances made to Test Year revenue
		24 PED WD III

1		requirements. Second, I have concerns about the impact of the fixed, minimum charge on
2		lower volume users and recommend that the Commission restructure the amount of
3		revenue recovered in the fixed, minimum charge.
4	Q.	PLEASE ELABORATE ON YOUR CONCERNS RELATED TO THE
5		COMPANY'S PROPOSED FIXED, MINIMUM CHARGE.
6	A.	Currently, the Company imposes a fixed, minimum wastewater charge of \$75.26 and is
7		proposing to increase that charge to \$80.29, a monthly increase of \$5.03 (or approximately
8		6.7%). When compared with available industry benchmarking information, specifically
9		the American Water Works Association's ("AWWA") 2019 Utility Benchmarking Study
10		("Benchmarking Study") excerpts of which are included herein as Attachment CDE-L, the
11		Company's existing fixed, minimum charge is already \$12.18 higher than the highest total
12		wastewater bill for a ratepayer using 7,500 gallons of wastewater per month. The fixed,
13		minimum charge cannot be avoided by a user through reduced system usage. Further, for
14		a lower volume user, changes in the fixed, minimum charge have a higher proportional
15		impact on their total bill. Given how high the Company's fixed, minimum charge already
16		stands, I recommend that the Commission hold this charge at current levels and pass along
17		any required increases in revenue recovery through the volumetric component of the
18		Company's rate structure.
19	Q.	ARE THERE LIMITATIONS ASSOCIATED WITH YOUR COMPARISON THAT
20		UTILIZES THE BENCHMARKING STUDY?
21	A.	Yes. There are several limitations and factors that I acknowledge and have considered in

utilizing the Benchmarking Study for my analysis.

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1	First, the benchmarking data produced in 2019 by the AWWA is based on financial
2	performance in 2018. As such, these values lie outside of the majority of the Company's
3	requested Test Year in this case. Due to the impact of inflation, it is most likely that the
4	corresponding values for 2019 for the utilities participating in this benchmarking study
5	would be higher. As shown in the Company's response to OPUC RFI No. 1-4, included
6	herein as Attachment CDE-M, the Consumer Price Index for South Urban – BLS is 1.4%.
7	To more closely approximate values in 2019, this percentage should be applied to the
8	reported benchmarking data from 2018.
9	Second, it is highly likely that the majority of respondents to the survey used in the

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Second, it is highly likely that the majority of respondents to the survey used in the Benchmarking Study represent publicly owned utilities as opposed to privately-owned utilities. Differences in ownership can impact benchmarking comparisons and challenge the direct applicability and comparability of the results.

Finally, the Benchmarking Study results do not distinguish other factors that may challenge the direct comparability of benchmarked entities, such as the overall size of the utility and system capacity, historical maintenance record, specific water sources or treatment technologies, or overall physical location. Because of the foregoing limitations and factors, I do not rely upon the Benchmarking Study for a direct comparison between the Company and the entities included in the Benchmarking Study.

Q. DO THESE LIMITATIONS INVALIDATE YOUR RECOMMENDATION?

No. I do not suggest that the fixed, minimum charge be brought down to levels comparable to the 2019 data included in the Benchmarking Study. However, the data included in the Benchmarking Study illustrates that the Company's fixed, minimum charge has already

1		been established at higher levels than what is seen within the industry, and therefore, it is
2		my recommendation that further increase of the fixed, minimum charge should be avoided
3		to protect ratepayers at lower volume levels.
4	Q.	HAVE YOU PREPARED A SCHEDULE DEMONSTRATING YOUR PROPOSED
5		WASTEWATER RATES IN THIS PROCEEDING?
6	A.	Yes. Schedule CDE-8 presents my recommended wastewater rates, both under the
7		Company's requested rate design as well as under my alternative rate design.
8		VIII. PROPOSED TARIFF CHANGES
9	Q.	WHAT TARIFF CHANGES IS THE COMPANY PROPOSING IN THIS
10		PROCEEDING?
11	A.	Monarch is proposing several tariff changes specific to this proceeding. As noted in the
12		Statement of Intent, Monarch proposes to:
13		1) change the purchased water pass-through mechanisms in the water tariff;
14		2) add to its wastewater tariff regarding pretreatment of non-standard wastewater;
15		3) clarify, and in certain cases, transfer ownership and responsibility for maintenance
16		of on-site pressure wastewater units;
17		4) change the default winter average wastewater usage from 5,000 gallons a month to
18		4,000 gallons a month; and
19		5) include the addition of a system improvement charge mechanism. ²⁵

²⁵ Statement of Intent for Authority to Change Rates.

1		It should be noted that in the Preliminary Order issued by the Commission on September
2		24, 2020, it was indicated that "Monarch's request to implement a system improvement
3		charge mechanism in its water and wastewater tariffs" is not to be addressed in this
4		proceeding as the rulemaking project associated with system improvement charges was
5		recently opened by the Commission and considering it in this docket would not be an
6		efficient use of resources. ²⁶
7	Q.	DO YOU AGREE WITH THE COMPANY'S PROPOSED CHANGES?
8	A.	No. The following adjustments to the Company's pass-through charges should be adopted:
9		1) The Company's request to amend its purchased water pass-through charges should
10		be disallowed.
11		2) Adjustments should be made to base rate revenue requirements to reflect the
12		Company's proposal concerning ownership of on-site pressure wastewater units.
13		3) The Company's request to amend its tap fees should be disallowed as Monarch has
14		not met its burden of proof on this issue.
15 16		a. Purchased Water and Purchased Wastewater Treatment Pass-Through Charges
17	Q.	PLEASE EXPLAIN YOUR UNDERSTANDING OF MONARCH'S PROPOSED
18		CHANGES TO ITS PURCHASED WATER AND PURCHASED WASTEWATER
19		TREATMENT PASS-THROUGH CHARGES.
20	A.	According to Company Witness Mr. Brian Bahr, Monarch is proposing an amended
21		purchased water and purchased wastewater treatment pass-through charge as the Company

²⁶ Preliminary Order at 11 (Sep. 24, 2020).

believes the intent of the charge "can be accomplished through a simpler, more accurate calculation . . . [and] Monarch expects the new pass-through will be easier to track, review, and administer." Specifically, Monarch is proposing to include the Test Year cost of purchased water or purchased wastewater treatment in base rates, and then use the corresponding pass-through charge as a "balancing account" to either recover or credit to ratepayers the difference between the amount of purchased water or purchased wastewater cost included in base rates and actual cost incurred by the Company.

In response to Commission Staff RFI No. 1-5, included herein as Attachment CDE-N, the Company further asserts that "in Monarch's last general rate-case, the requested cost of service included purchased water costs, and the Commission approved a pass-through mechanism to allow Monarch to capture the difference in purchased water costs from that baseline amount Monarch maintains that its proposed purchased water pass-through mechanism is reflective of the Commission's previous approved mechanism."

Q. WHAT PASS-THROUGH CLAUSES DOES THE COMPANY ALREADY HAVE IN PLACE?

A. Attachment CDE-O are selections from the Company's rate notice, which list the various pass-through charges and the system to which they apply. Additionally, Attachment CDE-P includes the attachment provided in response to the Company's Response to

²⁷ Direct Testimony of Brian Bahr at 22:21–23:6.

²⁸ Monarch's Response to Commission Staff RFI No. 1-5 (See Attachment CDE-N).

1		Commission Staff RFI No. 1-3, which lists each type of service provider that is currently
2		included within the Company's various pass-through charges.
3		As illustrated in these pages, the current pass-through charges range, as an example,
4		from a low of \$0.69 per 1,000 gallons for the Monarch Utilities I, L.P. systems and a charge
5		of \$0.1082 per 1,000 gallons for the systems subject to the Trinity Glenn Rose
6		Groundwater Conservation District ("GCD") pass-through charge to a high of \$10.667
7		monthly charge per ratepayer associated with the Canyon Lake Water Service Company
8		Purchased Water pass-through charge.
9	Q.	DO YOU AGREE WITH THE COMPANY THAT THE PASS-THROUGH
10		PROVISION APPROVED IN MONARCH'S LAST GENERAL RATE CASE,
11		DOCKET NO. 45570, ²⁹ INCLUDED ONLY RECOVERY OF THE
12		INCREMENTAL DIFFERENCE BETWEEN ACTUAL PASS-THROUGH COSTS
13		AND THE AMOUNT OF PASS-THROUGH COST INCLUDED IN THE BASE
14		RATES?
15	A.	No. As shown on Attachment CDE-Q, the Company's approved pass-through gallon
16		charge adjustment in Docket No. 45570 identifies several variables based on total cost. For
17		example, variable "E" is the "Projected sum for upcoming 12 months of Purchase Water
18		and District Costs." Variable "AP" and "AC" are the actual payments or collections for
19		the prior 12 months. As defined, these variables make it clear that the pass-through was

²⁹ Application of Monarch Utilities I, L.P. for Authority to Change Rates, Docket No. 45570, Order (Aug. 21, 2017).

1		intended to include all charges associated with the pass-through, not simply the incremental
2		difference between the pass-through and what is included in base rates.
3		Further, in reviewing the Unanimous Stipulation and Settlement Agreement filed
4		in Docket No. 45570, I am unable to find a revenue requirements schedule that specifically
5		shows and supports that the Company's approved revenue requirements in that proceeding
6		included purchased water costs. While the Company may have requested that purchased
7		water costs be included in its revenue requirements in Docket No. 45570, I do not share
8		the Company's opinion that the Commission has previously approved a pass-through
.9		clause which only covers the incremental difference between pass-through costs included
10		in base rates and actual costs. As noted by the Company in response to Commission Staff
11		RFI No. 1-6, included herein as Attachment CDE-R, the settlement in Docket No. 45570
12		was a "black-box settlement." Therefore, the intent of including or excluding purchased
13		water or purchased wastewater treatment expense in the revenue requirement is unknown.
14	Q.	DO YOU AGREE WITH THE COMPANY'S PROPOSAL TO AMEND ITS
15		PASS-THROUGH CALCULATION?
16	A.	No.
17	Q.	WHY SHOULD THE COSTS CURRENTLY COLLECTED BY A
18		PASS-THROUGH CLAUSE NOT BE INCLUDED IN BASE RATES?
19	A.	A pass-through clause in a tariff allows the Company to pass-through costs incurred via
20		third parties, such as wholesale water or wastewater treatment providers. Such expenses
21		are typically subject to significantly less dispute than the Company's full cost of service in

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a full rate proceeding as the Company is simply collecting the money from one party (the

ratepayer) and passing it through to another party (e.g., the wholesale supplier). Pass-through charges can be approved and amended by the Commission as a minor tariff change without a contested case proceeding.³⁰ The Company's proposal would not change any of the above circumstances.

Instead, what would change under the Company's proposal would be a reduction in the amount of money subject to pass-through, thereby lowering the Company's risk profile and the potential for over- or under-recovery in pass-through charges year to year. Further, it appears that in Monarch's proposed tariff the Company is proposing that all pass-through cost, whether purchased water or purchased wastewater treatment expense, would be consolidated and all ratepayers would become subject to a uniform pass-through charge, regardless of whether they benefit from and are provided service via purchased water or purchased wastewater treatment services. The Company further confirms this intent in response to discovery wherein it states, "Monarch is proposing a single, purchased water pass-through mechanisms under which a single purchased water pass-through charge would be calculated and applied to all Monarch ratepayers Monarch is authorized to charge uniform rates for all its systems. This authorization is not limited only to base rates, but all rates, including pass-through charges." 31

Q. PLEASE ELABORATE ON YOUR STATEMENT THAT RATEPAYERS THAT NEITHER BENEFIT FROM NOR ARE PROVIDED SERVICE VIA PURCHASED

³⁰ 16 TAC § 24.25(b)(2)(C).

³¹ Monarch's Response to Commission Staff RFI No. 1-6 (See Attachment CDE-R).

WATER OR P	URCHASED	WASTEWATER	TREATMENT	SERVICE	WOULD
BE PAYING FO	OR THIS SER	RVICE UNDER TI	HE COMPANY	S PROPOS	SAL.

A.

Under the Company's proposed tariff, all ratepayers would be subject to the same purchased water or purchased wastewater treatment pass-through charge determined by the formula proposed in the Company's proposed tariff. Effectively, the Company proposes to take all its purchased water and purchased wastewater treatment expense and develop a pass-through charge, which would apply to all ratepayers, regardless of their source of water or wastewater treatment. This is confirmed by the Company's own statements in response to discovery.³²

As an example, please see Page 6 of Attachment CDE-O. As shown, the systems identified next to the San Antonio Water System ("SAWS") Purchased Water Pass-through currently pay a monthly charge of \$10.667 for water purchased from SAWS. Under the Company's proposal, this expense, which is specific to these systems, 33 would be spread and borne by all ratepayers on Monarch's consolidated systems. Effectively, the Company's proposed tariff language related to purchased water and purchased wastewater treatment would institute a continuing subsidy to favor certain systems from the larger group of Monarch's ratepayers who receive no benefit from the purchased water or purchased wastewater treatment service.

Q. DOES THE TEXAS WATER CODE ("TWC") SPEAK TO THIS TYPE OF RATE OR TARIFF CONSOLIDATION PROPOSED BY THE COMPANY?

³² Monarch's Response to Commission Staff RFI No. 1-6 (See Attachment CDE-R).

³³ Systems include Bavarian Hills, Cascade, Coolcrest, Country Bend/Country Springs, Garden Oaks, Oaks North MHP, and Stagecoach Hills.

2		are substantially similar in terms of facilities, quality of service, and cost of service.
3		Monarch is exempted from these requirements due to the exclusion provided in TWC
4		§ 13.145(b) which states that required proof of substantial similarity "does not apply to a
5		public utility that provided utility service in only 24 counties on January 1, 2003,"34 which
6		is a situation unique to Monarch. However, the Commission must still exercise its
7		jurisdiction under the Texas Water Code to "ensure that every rate made, demanded, or
8		received by any utility shall be just and reasonable" and that rates are not "unreasonably
9		preferential, prejudicial, or discriminatory but shall be sufficient, equitable, and consistent
10		in application "35
11	Q.	WILL THE COMPANY'S PROPOSED CONSOLIDATION OF ITS PASS-
12		THROUGH PROVISIONS WITHIN ITS PROPOSED TARIFFS RESULT IN
13		RATES THAT ARE JUST AND REASONABLE AND NOT UNREASONABLY
14		PREFERENTIAL, PREJUDICIAL, OR DISCRIMINATORY?
15	A.	No. Consolidating these pass-through charges as proposed by the Company will result in
16		a long-term subsidy of ratepayers that benefit from sources of purchased water or

purchased wastewater treatment paid for by ratepayers that do not receive this same benefit.

Consolidated pass-through charges would be preferential to ratepayers that benefit from

the service, and prejudicial or discriminatory to those that do not receive the service. While

some level of subsidy already exists due to the historical consolidation of Monarch-owned

TWC § 13.145(a)(1) speaks to systems being consolidated under a single tariff only if they

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³⁴ TWC § 13.145(b).

³⁵ TWC § 13.182.

1		water systems, permitting the Company to further consolidate pass-through charges would
2		only serve to further enhance and expand these existing subsidies resulting in rates which
3		are not just and reasonable.
4		b. Ownership of On-Site Pressure Wastewater Units
5	Q.	PLEASE EXPLAIN YOUR UNDERSTANDING OF MONARCH'S PROPOSED
6		CHANGES CONCERNING OWNERSHIP OF ON-SITE PRESSURE
7		WASTEWATER UNITS.
8	A.	Within the Company's proposed tariff, the Company seeks to include a provision that states
9		specific to Residential ratepayers, the utility will install and maintain all required
10		equipment and "all maintenance, repairs, and replacement will be performed by the utility.
11		Electrical bills are the customer's responsibility."36 The proposed language for Residential
12		ratepayers also makes clear that the cost of repairs associated with a ratepayer flushing
13		"materials that are known to clog grinder/stations" will be "charged in full to said
14		customer." ³⁷
15		On the other hand, for Multi-family and Commercial Receiving Tanks / Lift
16		stations, the Company's proposed tariff states that "the customer shall hold title to and the
17		responsibility to maintain and repair all equipment necessary to connect that service
18		location to the Utility's pressurized collection line. The customer shall be responsible for
19		the monthly electric bill." ³⁸

³⁶ Direct Testimony of George Freitag, Attachment GF-5 at 52.

^{37,} Id.

³⁸ *Id*.

1	Q.	PLEASE EXPLAIN YOUR PRIOR TESTIMONY WHEREIN YOU STATE THAT
2		THE COMPANY'S PROPOSED CHANGES RELATED TO ON-SITE PRESSURE
3		WASTEWATER UNITS WILL NECESSITATE A CHANGE TO BASE RATE
4		REVENUE REQUIREMENTS.
5	A.	Given the Company's proposal to require Multi-Family and Commercial ratepayers to hold
6		title to and be responsible for the maintenance and repair of equipment, and to pass along
7		the cost of maintenance and repairs to Residential ratepayers for the flushing of materials
8		which lead to clogs, the Company will see a decrease in on-going expense associated with
9		on-site pressure wastewater units. To the extent the Company is currently paying electrical
10		expenses for any of this equipment or has incurred costs from ratepayers that flushed
11		materials resulting in clogged equipment, such expenses will now be the responsibility of
12		the ratepayer. In addition, any and all expenses associated with the operation, maintenance,
13		repair, or replacement of Multi-family and Commercial equipment will also be the sole
14		responsibility of the ratepayer. If the Commission accepts these proposed changes, then
15		all attendant impacts of these proposed changes, including the potential cost decreases,
16		should be identified and factored into the revenue requirement commensurate with the
17		change in tariff language.
18	Q.	WHAT EXPENSE DID THE COMPANY INCUR DURING THE TEST YEAR
19		ASSOCIATED WITH ON-SITE PRESSURE WASTEWATER UNITS?
20	A.	In the Company's response to OPUC RFI No. 1-5, included herein as Attachment CDE-S,
21		the Company identified "627 service orders from the test year that were related to issues
22		with the on-site wastewater grinder/sewage stations. The total costs related to the service

1		orders are \$326,169.65." ³⁹ The Company is unable to identify based on available
2		information how many of the service orders are associated with a ratepayer flushing
3		material that clogged the station, or the cost of the work orders associated with Multi-
4		Family and Commercial equipment.
5	Q.	WHAT IS YOUR RECOMMENDATION WITH RESPECT TO THE
6		ADJUSTMENT THAT SHOULD BE MADE TO RECOGNIZE THE COST
7		DECREASES?
8	A.	Given that the Company cannot quantify the level of expense associated with activities that
9		will now be the ratepayer's responsibility, I recommend that 50% of the identified service
10		order expense, or \$163,084.83 (\$326,169.65 * 50%) be removed from O&M expense
11		within the base rate revenue requirement to reflect the likely cost decreases that the
12		Company will see from its requested tariff changes. The Company's ratepayers should not
13		be subjected to recovery of this expense in base rates, and at the same time bear full
14		responsibility for these expenses on a going forward basis.
15		c. Changes to Tap Fees
16	Q.	PLEASE EXPLAIN YOUR UNDERSTANDING OF MONARCH'S PROPOSED
17		CHANGES CONCERNING ITS WATER AND WASTEWATER TAP FEES.
18	A.	Per the notice to ratepayers provided within Monarch's RFP, the Company is proposing to
19		adjust water and wastewater tap fees as indicated in Table 7 below:

³⁹ Monarch's Response to OPUC RFI No. 1-5.

Table 7
Proposed Tap Fee Changes

<u>Fee</u>	<u>Current</u>	Proposed	<u>Change</u>
Water			
Residential	\$ 700	\$ 1,470	\$ 770
Wastewater			
Residential – Gravity	\$ 700	\$ 2,095	\$ 1,395
Pressure Sewer – Non-Rock	\$ 1,525	\$ 3,160	\$ 1,635
Pressure Sewer – Rock	\$ 3,776	\$ 4,276	\$ 500

3 Q. HAS THE COMPANY PROVIDED INFORMATION TO SUPPORT ITS

- 4 REQUESTED CHANGE IN TAP FEES?
- A. In response to OPUC RFI No. 5-1, included herein as Attachment CDE-T, the Company provided a listing of water taps and the total cost of each tap, exclusive of administrative costs or Customer Service Inspection Costs. The same information was provided for wastewater in response to OPUC RFI No. 5-2, included herein as Attachment CDE-U.
- 9 Q. AFTER REVIEWING THE REQUESTED INFORMATION, DO YOU AGREE
 10 WITH THE COMPANY'S PROPOSED CHANGE TO WATER TAP FEES?
- 11 A. No.
- 12 Q. PLEASE EXPLAIN.
- 13 A. When the individual costs of water taps provided in response to OPUC RFI No. 5-1 are
 14 averaged together, the average tap cost is \$618.43.⁴⁰ As noted in the Company's response
 15 to OPUC RFI No. 5-3, included herein as Attachment CDE-V, the Company claims
 16 customer service inspection expense of \$74 and customer account set-up expense of \$50,
 17 amounts which are not supported by further documentation. Since these costs were not
 18 included in the tap fee expense provided in response to OPUC RFI No. 5-1, the costs would

⁴⁰ Company Response to OPUC RFI No. 5-1.

1		need to be added to the average tap cost, for a total tap cost of \$742.43. This is substantially
2		lower than the Company's requested water tap fee of \$1,470.
3	Q.	ARE THERE OTHER POTENTIAL REASONS FOR THE DIFFERENCE IN
4		YOUR CALCULATIONS AND THE COMPANY'S PROPOSED TAP FEE?
5	A.	Yes. As noted in the Company's response to OPUC RFI No. 5-3, the Company is claiming
6		a bore expense for long taps of \$1,400, an amount which is not supported by additional
7		documentation. However, the Company's historical tap fees provided in response to
8		OPUC RFI No. 5-1 seem to imply that boring expense is included for taps that require it,
9		because the Company indicated these "Service Orders do not include administrative costs
10		or Customer Service Inspection costs." ⁴¹ The response is silent on whether the expense
11		associated with boring for long taps is included or excluded. If the boring expense must
12		be added to the provided figures, then it is possible the Company's tap fee could potentially
13		be reasonable in light of the cost once fully supported by documentation.
14	Q.	WHAT IS YOUR RECOMMENDATION SPECIFIC TO THE COMPANY'S
15		REQUESTED INCREASE IN WATER TAP FEES?
16	A.	While the Company has produced information in discovery, the Company still has yet to
17		fully meet its s burden of proof in support of its requested tap fee increase, and therefore,
18		the proposed increase should be disallowed unless further information is provided in the
19		record to substantiate the cost. Specifically, the Company must respond to the following:
20		elements:
		⁴¹ Id.

1		1) Provide documentation supporting its requested customer service inspection cost
2		of \$74;
3		2) Provide documentation supporting its requested Customer account setup cost of
4		\$50; and
5		3) Indicate if the test year per tap fee expense provided in response to OPUC RFI No.
6		5-1 includes or excludes boring expense where applicable, and if excluded, provide
7		documentation supporting its requested boring expense of \$1,400.
8	Q.	AFTER REVIEWING THE REQUESTED INFORMATION, DO YOU AGREE
9		WITH THE COMPANY'S PROPOSED CHANGE TO WASTEWATER TAP
10		FEES?
11	A.	No.
12	Q.	PLEASE EXPLAIN.
13	A.	When the individual costs of wastewater taps provided in response to OPUC RFI No. 5-2
14		are averaged together, the average tap cost is \$2,184.29. This would seem to support the
15		Company's proposed wastewater tap fee of \$2,095, particularly before the addition of
16		customer service inspection and boring. However, the Company is proposing tap fees
17		specific to wastewater taps with on-site wastewater lift stations, which are substantially
18		more expensive, as noted in Table 7. The Company's Response to OPUC RFI No. 5-2
19		does not distinguish between the type of tap performed during the test year, and whether it
20		was a standard tap or one that involved an on-site lift station. It is possible that after this

distinction is made, the average wastewater tap cost in the test year for a standard

connection could be less than what has been requested by the Company. Finally, similar

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1		to the water tap fee, the Company's response is ambiguous on the inclusion or exclusion
2		of boring expense, an expense amount which is not supported by further documentation.
3	Q.	WHAT IS YOUR RECOMMENDATION SPECIFIC TO THE COMPANY'S
4		REQUESTED INCREASE IN WASTEWATER TAP FEES?
5	A.	Similar to the water tap fee, the Company has not fully met its burden of proof specific to
6		the requested increase in wastewater tap fees, and the fee increase should be disallowed
7		unless further information is provided in the record to substantiate the cost. Specifically,
8		the Company must respond to the following elements:
9		1) Provide documentation supporting its requested customer service inspection cost
10		of \$73;
11		2) Specific to the test year wastewater tap fee expenses provided in response to OPUC
12		RFI No. 5-2, indicate the type of tap performed, whether its a standard tap or one
13		involving an on-site sewer lift station; and
14		3) Indicate if the test year per tap fee expense provided in response to OPUC RFI No.
15		5-2 includes or excludes boring expense where applicable, and if excluded, provide
16		documentation supporting its requested boring expense of \$1,300.
17		IX. RATE-CASE EXPENSES
18	Q.	IS THE COMPANY REQUESTING RECOVERY OF RATE-CASE EXPENSES IN
19		THIS PROCEEDING?
20	A.	Yes.

1	Q.	WHAT REQUIREMENTS MUST BE MET FOR THE COMPANY TO RECOVER									
2		ITS RATĘ-CASE EXPENSES?									
3	A.	16 TAC § 24.44 addresses the recovery of rate-case expenses. While utilities are allowed									
4		to recover rate-case expenses, they also bear the burden of proving the "reasonableness of									
5		such rate-case expenses by a preponderance of the evidence." ⁴²									
6	Q.	DO YOU HAVE RECOMMENDATIONS REGARDING THE									
7		REASONABLENESS OF THE COMPANY'S REQUESTED RATE-CASE									
8		EXPENSES?									
9	A.	No, not at this time. While the Company has provided information within its application									
10		containing externally generated rate-case expenses, the incurrence of rate-case expense is									
11		still on-going and will require further review and deliberation as the Company supplements									
12		its rate-case expense information.									
13	Q.	PLEASE EXPLAIN THE DISTINCTION YOU MADE IN YOUR PRIOR ANSWER									
14		REGARDING EXTERNAL EXPENSES. IS THE COMPANY PROPOSING TO									
15		RECOVER INTERNAL EXPENSES ASSOCIATED WITH THIS RATE CASE?									
16	A.	Yes. According to the Direct Testimony of Company Witness Mr. Brian Bahr, "Monarch									
17		reserves the right to request recovery of any internal rate case expenses to be recorded as									
18		this application is processed by the Commission."43									
19	Q.	DO YOU AGREE WITH THE COMPANY'S PROPOSAL?									

⁴² 16 TAC § 24.44(b).

⁴³ Direct Testimony of Brian Bahr at 25:10-11.

1	A.	I agree with the Company's intent to identify internal rate-case expenses; however, to the
2		extent these expenses are for personnel salaries and wages, benefits, or other on-going and
3		recurring expenses included within the Company's requested level of O&M expenses
4		included in base rates, then there should be a commensurate reduction to O&M expenses
5		included in base rates to ensure that these expenses are not double-recovered. The
6		Company's ratepayers should not be subjected to base rates and a rate case surcharge that
7		recovers the same cost.
8	Q.	HOW IS THE COMPANY PROPOSING TO RECOVER RATE-CASE EXPENSES
9		FROM RATEPAYERS IN THIS PROCEEDING?
10	A.	According to Company Witness Mr. Brian Bahr, "Monarch proposes to recover its rate
11		case expenses by way of a surcharge to be applied on all ratepayer bills for a period of 12
12		months or until all approved costs have been recovered, whichever is later."44
13	Q.	DO YOU AGREE WITH THE COMPANY'S REQUEST TO RECOVER
14		RATE-CASE EXPENSES THROUGH A SURCHARGE ASSESSED OVER A
15		12-MONTH PERIOD?
16	A.	I agree that the Company should recover its rate-case expense though a surcharge, however,
17		the recovery period should be extended to at least 24 months if not a full 36-month period.
18		For some ratepayers, the increase in monthly bills resulting from the rates proposed in this
19		proceeding will be significant as their rates are brought up-to-date and consolidated with
20		other systems. Further, some ratepayers are still subject to phased-in rate adjustments from
21		prior dockets, while other ratepayers will see phased-in rate adjustments for years to come

⁴⁴ *Id.* at 25:16-18.

as a result of this proceeding. In addition, ratepayers that were subject to rate changes in Docket No. 47736 are currently paying \$4.56 in monthly rate-case surcharges. This amount will be significantly increased by the rate case surcharges imposed in this docket. Given these circumstances, it seems reasonable to extend the recovery period for rate-case expenses to minimize the overall impact of this recovery on ratepayers who are already saddled with substantial increases in their monthly bills as a result of the revenue requirement increases by the Company.

X. CONCLUSION

9 Q. DOES THIS CONCLUDE YOUR TESTIMONY?

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10 A. Yes. However, due to on-going discovery, I reserve the right to supplement or amend my
11 testimony as may be needed.

⁴⁵ Direct Testimony of George Freitag, Attachment GF-4 at 99-100.

ATTACHMENTS



Chief Financial Officer cekrut@newgenstrategies.net

Mr. Chris Ekrut currently serves as Chief Financial Officer for NewGen Strategies and Solutions as well as a Director in the Firm's Environmental Practice. Mr. Ekrut has been providing consulting services since 2004, with the majority of his client-related projects focused on the pricing of services and developing rates and fees for utility systems.

Mr. Ekrut is a recognized expert witness, having filed testimony regarding cost of service and rate design, as well as providing litigation support and regulatory filing assistance before rate regulatory agencies. He has conducted a significant number of wholesale and retail water and wastewater rate studies, developed water, wastewater, and stormwater rate and fee models, and assisted in negotiations and/or litigation involving a number of wholesale water or wastewater contracts. He also serves as an instructor for the national "Fundamentals of Water Cost of Service and Rate Design" class sponsored by EUCI.

His previous experience includes time with R.W. Beck, Inc. as a staff consultant and with J. Stowe & Co. (now NewGen) as a senior consultant and manager.

EDUCATION

- Master of Public Administration, University of North Texas
- Bachelor of Arts in Public Administration, West Texas A&M University

EXPERIENCE

During his career, Mr. Ekrut has assisted in conducting a variety of engagements for water, wastewater, drainage, solid waste, electric, and natural gas utilities. A sampling of Mr. Ekrut's experience is included below. Clients marked with an asterisk indicate multiple projects were performed for that client within that category of service.

Utility Business Plans

- City of Blue Mound, Texas
- City of Gainesville, Texas

■ Town of Prosper, Texas

Operations and Management Reviews

- Lower Colorado River Authority's Water and Wastewater Service Unit
- Brownsville Public Utilities Board

System Valuations

- City of Blue Mound, Texas
- City of Oak Point, Texas
- City of Southmayd, Texas

- City of Tyler, Texas
- Mustang Special Utility District
- Town of Lakeside, Texas

Indirect Cost Allocation Studies

City of Brenham, Texas

- City of Terrell, Texas *
- North Texas Municipal Water District *

Economics | Strategy | Stakeholders | Sustainability

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Wholesale and/or Retail Water, Reclaimed Water, Wastewater, and Drainage Cost of Service and Rate Design Studies

- Town of Addison, Texas
- City of Aledo, Texas *
- Town of Argyle, Texas
- City of Amarillo, Texas
- City of Bastrop, Texas *
- City of Bellaire, Texas
- City of Blue Mound, Texas *
- City of Bonham, Texas *
- City of Brenham, Texas *
- City of Burkburnett, Texas *
- City of Burnet, Texas *
- Canyon Regional Water Authority *
- City of Cedar Park, Texas
- City of Celina, Texas
- City of Cisco, Texas
- City of Coleman, Texas
- City of Colleyville, Texas
- Double Diamond Utilities Co. *
- City of Eunice, New Mexico
- City of Farmersville, Texas *
- City of Forest Hill, Texas *
- City of Forney, Texas
- City of Gainesville, Texas *
- City of Gatesville, Texas *
- City of Garland, Texas *
- City of Glenn Heights, Texas *

- City of Graham, Texas
- City of Grapevine, Texas *
- City of Irving, Texas
- City of Jacksonville, Texas
- Johnson County Special Utility District *
- City of Justin, Texas
- City of Killeen, Texas *
- Town of Lakeside, Texas *
- City of Lancaster, Texas *
- City of League City, Texas
- City of Lewisville, Texas *
- City of Liberty Hill, Texas
- City of Lubbock, Texas
- City of McGregor, Texas *
- City of Mabank, Texas
- City of Mansfield, Texas *
- Marilee Special Utility District *
- City of Mexia, Texas
- City of Mineral Wells, Texas *
- City of Murphy, Texas
- Mustang Special Utility District
- MSEC Enterprises
- Navajo Tribal Utility Authority
- North Texas Municipal Water District
- Nueces County Water Control and Improvement District No. 3

- City of Odessa *
- Town of Pantego, Texas
- City of Paris, Texas *
- Parker Special Utility District
- Pillan Income Asset Management
- Pittsburgh Water and Sewer Authority
- City of Portland, Texas
- Possum Kingdom Water Supply Corporation
- Town of Prosper, Texas *
- Quadvest
- Riverbend Water Resources
 District
- City of Roanoke, Texas *
- Sabine River Authority
- City of Sanger, Texas
- City of Seagoville, Texas *
- South Texas Water Authority *
- City of Stamford, Texas
- City of Terrell, Texas *
- City of Thornton, Colorado
- Trophy Club Municipal Utility District No. 1 *
- City of Tyler, Texas *
- City of Waco, Texas *
- City of Weatherford, Texas *
- West Wise Special Utility District
- City of Willow Park, Texas *
- City of Wolfforth, Texas *

Chief Financial Officer

Service Area Valuations / Appraisals

- Aquilla Water Supply Corporation
- Double Diamond Utilities *
- Green Valley Special Utility District
- Guadalupe-Blanco River Authority
- Kempner Water Supply Corporation
- Johnson County Special Utility District

- MSEC Enterprises
- Mustang Special Utility District *
- City of Tyler, Texas
- City of Waco, Texas
- Additional appraisals for private individuals

Feasibility Studies / Rate Impact of Engineering Recommendations / Peer Review

- Ector County Special Utility District
- City of Forney, Texas
- City of Garland, Texas *
- North Texas Municipal Water District
- McLennan County, Texas

- City of Odessa, Texas
- Town of Palm Beach, Florida (Electric Study)
- Upper Trinity Regional Water District
- City of Waco, Texas *

Litigation Support

Provided litigation support, directly or as a subcontractor, to the following entities.

- BASF Corporation
- Double Diamond Utilities *
- MSEC Enterprises
- North Texas Municipal Water District
- Office of Public Utility Counsel *
- Rock Creek Water Supply Corporation
- Texas RioGrande Legal Aid
- Town of Star Harbor, Texas
- West Wise Special Utility District

Rulemaking Regulatory Support

Provided Expert Assistance to Office of Public Utility Counsel (OPUC) for the following PUC Rulemaking Projects.

- PUC Project No. 43871
- PUC Project No. 43876
- PUC Project No. 43967
- PUC Project No. 44462
- PUC Project No. 44706

- PUC Project No. 45111
- PUC Project No. 45113
- PUC Project No. 45118
- PUC Project No. 45758

General Fund Studies

- City of Arlington, Texas (Oil/Gas Well Emergency Fee)
- City of Burkburnett, Texas (Planning and Development Fees)

Chief Financial Officer

- City of Bonham, Texas (Ambulance Service Fee, Street Maintenance Fee)
- City of Killeen, Texas (Street Maintenance Fee)
- City of New Braunfels, Texas (Planning and Development / Community Service Fees)

Solid Waste Experience

- Assisted in conducting a Municipal Solid Waste Operations Study for the City of Denton, Texas.
- Assisted in conducting an Alternative Feasibility Study for the City of Peoria, Arizona.
- Assisted Siemens Energy and Environmental Services in conducting a detailed Waste Shed Analysis of the DFW Metroplex in support of a new, environmentally friendly waste processing technology.
- Assisted in conducting a Mixed Recycling Facility (MRF) Study for the North Central Texas Council of Governments.

Electric Utility Experience

- City of Austin, Texas
- City of Bastrop, Texas
- City of Brenham, Texas
- City of Burnet, Texas

- Garland Power & Light
- City of Liberty, Texas
- City of Sanger, Texas

Impact Fee / Capital Recovery Experience

Mr. Ekrut has assisted in the development of Water, Wastewater, and/or Roadway Impact Fees for the following clients.

- City of Bastrop, Texas *
- City of Burnet, Texas *
- City of College Station, Texas
- City of Denton, Texas *
- City of Flower Mound, Texas *
- City of Frisco, Texas *
- City of Ft. Worth, Texas *
- City of Galveston, Texas
- City of Garland, Texas

- City of Glenn Heights, Texas
- City of League City, Texas
- City of McKinney, Texas *
- City of Mesquite, Texas
- Nueces County Water Control and Improvement District No. 4
- Parker County Special Utility District
- City of Willow Park, Texas

Franchise Fee Experience

- Assisted in conducting reviews of the franchise fee payments made by Charter Communications to the Cities of Rockwall and Denton, Texas.
- Assisted in conducting reviews of the franchise fee payments made by Oncor to a coalition of Cities within the State of Texas.

Chris D. Ekrut Chief Financial Officer

Assisted in conducting franchise fee reviews of gas and electric providers in Fayette County, Kentucky.

Chief Financial Officer

Gas Utility Experience

- Assisted the City of Brenham, Texas in analyzing and amending their Gas Cost Adjustment Factor.
- Provided litigation support in Texas Railroad Commission Docket No. 9670 Petition for De Novo Review of the Reduction of the Gas Utility Rates of ATMOS Energy Corp., Mid Tex Division.

Publications and Presentations

- "Allocating the Costs of Population Growth in Wholesale Water Contracts," Texas Water Law Conference, January 2007
- "Business Planning and its Benefits to Municipal Utilities," American Water Works Association, Texas Section, 2008
- "Plan Your Work and Work Your Plan: The Benefits of Municipal Utility Business Planning," Texas Town & City, October 2009
- "Strategies for Pricing Direct Water Reuse," Texas Water Conservation Association, March 2013
- "Utility Management and Revenue Considerations;" New and Emerging City Manager Roundtable and New and Emerging Finance Director Roundtable; North Central Texas Council of Governments; 2014, 2015, 2016, 2017, and 2018
- "Texas Water Development Board Water Conversation Best Management Practices Model: Estimating Water Conservation Savings for New Annual Reporting Requirements," Texas Water Conservation Association, March 2014
- "When in Drought! Utility Ratemaking 101," Government Finance Officers Association of Texas, April 2014
- "Aledo, Texas How a Small City Overcame a Capital Improvement Giant," American Water Works Association, Utility Management Conference, January 2015
- "To the PUC... and Beyond!," Government Finance Officers Association of Texas, Pre-Conference, November 2015
- "Getting a Good Opinion: The Importance of Financial Policies and the Impact on a Utility's Credit Rating" American Water Works Association, Texas Section, April 2016
- * "Legislative and Regulatory Update for Water and Wastewater Utilities," Government Finance Officers Association of Texas, Panhandle Chapter, July 2016
- "That'll Be the Day that Water Rates Change in Lubbock," American Water Works Association, Texas Section, April 2018
- "Decimated by Data Common Utility Billing Mistakes and the Impact on Water and Sewer Utilities," American Water Works Association, Texas Section, April 2018
- "When, Water, Where, and Why The Importance of Rate Studies in Utility Management," American Water Works Association, Texas Section, April 2019
- "Machine Learning Facilitated Stormwater Financing," Forester University, September 2020

Corporate Record of Testimony Submitted by Chris Ekrut

	Utility	Proceeding	Subject of Testimony	Before	Client	Date
	Double Diamond Utilities	SOAH Docket No. 582-09-4288	Water Cost of Service and Rate Design	Texas Commission on Environmental Quality	Double Diamond Utilities	2010
	Double Diamond Utilities	SOAH Docket No. 582-09-6112	Wastewater Cost of Service and Rate Design	Texas Commission on Environmental Quality	Double Diamond Utilities	2010
3.	City of Arlington	Cause No. 153- 259190-12	Municipal Fee Determination	Tarrant County District Court, 153 rd Judicial District	City of Arlington, Texas	2013
	Double Diamond Utilities	PUC Docket No. 42919	Water and Wastewater Cost of Service and Rate Design / Settlement Terms and Conditions	Public Utility Commission of Texas	Double Diamond Utilities	2014
5.	Quadvest, LP	PUC Docket No. 44809	Review and Adjustments to Water Rate/Tariff Change	Public Utility Commission of Texas	Office of Public Utility Counsel	2016
	Trophy Club Municipal Utility District No. 1	PUC Docket No. 45231	Water and Wastewater Cost of Service and Rate Design / Support of Rate Action on Appeal	Public Utility Commission of Texas	Trophy Club Municipal Utility District No. 1	2016
7.	Monarch Utilities I, LP	PUC Docket No. 45570	Review and Adjustments to Water and Wastewater Rate/Tariff Change	Public Utility Commission of Texas	Office of Public Utility Counsel	2016
	Double Diamond Properties Construction	PUC Docket No. 46247	Water Cost of Service and Rate Design / Settlement Terms and Conditions	Public Utility Commission of Texas	Double Diamond Properties Construction	2016
9.	Liberty Utilities	PUC Docket No. 46256	Review and Adjustments to Wastewater Rate/Tariff Change / Appeal of Rate Denial by City of Tyler	Public Utility Commission of Texas	City of Tyler, Texas	2017
	Custom Water Company	PUC Docket No. 46670	Water Cost of Service and Rate Design	Public Utility Commission of Texas	Custom Water Company	2017
	North Texas Municipal Water District	PUC Docket No. 46662	Public Interest	Public Utility Commission of Texas	North Texas Municipal Water District	2018
12.	Liberty Silverleaf	PUC Docket No. 47976	Review and Adjustments to Water and Wastewater Cost of Service and Rates / Tariff Change	Public Utility Commission of Texas	Office of Public Utility Counsel	2018
	Indiana American Water Company	IURC Cause No. 45142	Cost of Service and Revenue Requirements specific to Sale for Resale Customers	Indiana Utility Regulatory Commission	Towns of Schererville and Whiteland	2019
14.	City of Forney	PUC Docket no. 47814	Public Interest	Public Utility Commission of Texas	City of Forney, Texas	2019
ı	Kendall West Utility, LLC	PUC Docket No. 49887	Review and Adjustments to Water Rate/Tariff Change	Public Utility Commission of Texas	Office of Public Utility Counsel	2020
16.	Undine Texas	PUC Docket No. 50200	Review and Adjustments to Water and Wastewater Cost of Service and Rates / Tariff Change	Public Utility Commission of Texas	Office of Public Utility Counsel	2020

SOAH DOCKET NO. 473-20-4709.WS PUC DOCKET NO. 50944

MONARCH'S RESPONSE TO OPUC'S FIRST RFI

OPUC 1-21 Please reference the Direct Testimony of Edward Taussig at 6–7. Please provide a monthly detailed listing of all employees, by filled position, from January 2018, through August 2020.

RESPONSE: Please see CONFIDENTIAL Attachment OPUC 1-21, being provided under seal. Positions in CONFIDENTIAL Attachment OPUC 1-21 are listed in both the "Total" headcount section in columns (a)-(g) and "Actual" headcount section in columns (h)-(m). Because employees can change roles over time, the Position descriptions in column (m) may vary over the 2018-2020 time frame.

Prepared by: Edward Taussig Sponsored by: Edward Taussig

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Pages 68 thru 194 contain Confidential Material

SOAH DOCKET NO. 473-20-4709.WS PUC DOCKET NO. 50944

MONARCH'S RESPONSE TO OPUC'S FIRST RFI

OPUC 1-9 Please reference the Direct Testimony of Mujeeb Hafeez at 11:21–22. Please provide details of all transactions, including receipts, which account for the \$141,000 in travel and entertainment expenses associated with the SWWC Board of Directors.

RESPONSE: As a point of clarification, the Test Year \$141,000 in travel and entertainment expense is not associated with the Board of Directors. The expense is related to travel for SouthWest's executives. Extensive travel is a requirement at the executive level. Refer to Attachment OPUC 1-9.1 for a detail of all transactions comprising this amount. OPUC provided representative sample selections to Monarch via email for which invoices were requested. Refer to voluminous Attachment OPUC 1-9.2, being provided in native format on CD, for invoices for the selected transactions.

Prepared by: Mujeeb Hafeez Sponsored by: Mujeeb Hafeez

CT MANUFER MANUFACTURE S			**************************************									**************************************
2019/12	WB8 element Order > Document Num 1200002064	610030	Travel - Lodging	Travel & Enfertainment 10				SWWC-Executive 100000	RICHARD RICH - EXPENSE REIMBURSEMENT	12/31/2019	12/31/2019	Amaunta Latin 1.812.27 USD :
2019/01	1900122337	610030	Travel - Lodging	Travel & Entertainment 10				SWWC-Executive 100000	" I MANUAL THAT THAT ILLIAM NOTIFICATION	1/10/2019	1/17/2019	618 11 USD
2019/01	1900123202	610030	Travel - Lodging	Travel & Enlerteinment_10			10100001	SWWC-Executive 100000		1/14/2019	1/23/2019	687 84 USD
2019/01	1900123365	610030	Travel - Lodging	Travel & Entertainment 10						1/18/2019	1/28/2019	567 41 USD
2019/12 2019/02	1200002064 1900124014	610030 610030	Travel - Lodging Travel - Lodging	Travel & Entertainment 10 Travel & Entertainment 10			10100001	SWWC-Executive 100000 SWWC-Executive 100000	RICHARD RICH - EXPENSE REIMBURSEMENT	12/31/2019 2/1/2019	12/31/2019 2/11/2019	958,02 USD 1,315 69 USD
2019/02	1900124411	610030	Travel - Lodging	Travel & Entertainment 10				SWWG-Executive 100000		1/30/2019	2/20/2019	454 80 USD
2019/02	1900124517	610030	Travel - Lodging	Travel & Entertainment 10						2/15/2019	2/22/2019	1,259 88 USD
2019/02	1900124518	610030	Travel - Lodging	Travel & Entertainment 10				SWWC-Executive_100000		2/15/2019	2/22/2019	837.41 USD
2019/03	1900125741 1900125743	610030	Travel - Lodging Travel - Lodging	Travel & Entertainment 10 Travel & Entertainment 10			10100001	SWWC-Executive 100000 SWWC-Executive 100000		3/5/2019 3/14/2019	3/25/2019	1,221 18 USD 265.13 USD
2019/03	1900125747	610030	Travel - Lodging	Travel & Entertainment 10			10100001	SWWC-Executive 100000		3/14/2019	3/25/2019	301,71 USD
2019/03	1900126016	610030	Travel - Lodging	Travel & Entertainment 11		₹ 40	10100001	SWWC-Executive 100000		3/25/2019	3/28/2019	748 D4_USD
2019/04 2019/04	1900126907 1900127091	610030 610030	Travel - Lodging	Travel & Entertainment 10 Travel & Entertainment 10			10100001	SWWC-Executive 100000		4/18/2019	4/23/2019	326 57 USD
2019/04	1900127091	610030	Travel - Lodging Travel - Lodging	Travel & Entertainment 10			10100001	SWWC-Executive 100000 SWWC-Executive 100000	vis n	4/12/2019	4/25/2019 4/25/2019	363,08 USD 350,28 USD
2019/05	1700002708	610030	Travel - Lodging	Travel & Entertainment 10			10100001	SWWC-Executive 100000	7 / / / / / / / / / / / / / / / / / / /	5/28/2019	5/30/2019	(1,221 06) USD ,
2019/05	1900127724	610030	Travel - Lodging	Travel & Entertainment 10			10100001	SWWC-Executive 100000	, , , , , , , , , , , , , , , , , , , ,	5/3/2019	5/9/2019	1,167 26 USD
2019/05	190012793B 1900127941	610030 610030	Travel - Lodging	Travel & Entertainment 10				SWWC-Executive 100000		4/29/2019	5/17/2019	271,32 USD
2019/05	1900127941	610030	Travel - Lodging Travel - Lodging	Travel & Entertainment 10 Travel & Potentainment 10			10100001	SWWC-Executive 100000 SWWC-Executive 100000		5/8/2019 5/10/2019	5/17/2019 5/17/2019	1,282 38 USD 266.76 USD
2019/05	1900128430	610030	Travel - Lodging	Travel & Entertainment 10	010 5 KI		10100001	SWWC-Executive 100000		5/19/2019	5/29/2019	1,362 76 USD
2019/05	190D128491	610030	Travel - Lodging	Travel & Entertainment 10	010 5 KI	₹ 40	10100001	SWWC-Executive 100000	48 - 1	5/28/2019	5/30/2019	1,221.05 USD
2019/05 2019/06	1900128543 1900128995	610030 610030	Travel - Lodging Travel - Lodging	Travel & Entertainment 10 Travel & Entertainment 10			10100001	SWWC-Executive 100000 SWWC-Executive 100000		5/28/2019	5/31/2019	1,245 70 USD
2019/06	1900128996	610030	Travet - Lodging Travet - Lodging	Travel & Entertainment 10			10100001	SWWC-Executive 100000 SWWC-Executive 100000			6/11/2019 6/11/2019	567,87 USD , 814 04 USD
2019/06	1900129553	610030	Travel - Lodging	Travel & Entertainment 10	010 6 KI		10100001	SWWC-Executive 100000	06/24/19	6/24/2019	6/24/2019	50 DO USD
2019/06	1900129592	610030	Travel - Lodging	Travel & Entertainment 10			10100001	SWWC-Executive 100000		6/25/2019	6/25/2019	196 14 USD :
2019/06 2019/06	1900129797 1900129861	610030 610030	Travel - Lodging Travel - Lodging	Travel & Entertainment 10 Travel & Entertainment 10			10100001	SWWC-Executive 100000 SWWC-Executive 100000	S v e meren enn sa	, , 6/17/2019 , 6/24/2019	6/30/2019 6/30/2019	176,22, USD 977 08 USD
2019/07	1900131011	610030	Travel - Lodging	Travel & Entertainment 10			10100001	SWWC-Executive 100000	•	7/2/2019	7/29/2019	120 00 USD :
2019/07	1900131018	610030	Travel - Lodging	Travel & Entertainment 10			10100001	SWWC-Executive 100000		7/3/2019	7/29/2019	459 56 USD
2019/08	1900131507	610030	Travel - Lodging	Travel & Entertainment 10			10100001	SWWC-Executive 100000		7/31/2019	8/7/2019	748 28 USD
2019/08 _ 2019/08	1900131509 1900131586	610030 _ 610030	Travel - Lodging	Travel & Entertainment 10 Travel & Entertainment 10			10100001	SWWC-Executive_100000		7/26/2019 8/6/2019	8/12/2019 8/12/2019	836 55 USD 832,54 USD
2019/08	1900131587	610030	Travel - Lodging	Travel & Entertainment 10	0.0		10100001	SWWC-Executive 100000		8/5/2019	8/12/2019	110 21 USD
2019/08	1900131589	610030	Travel - Lodging	Travel & Enlertainment_10			10100001	SWWC-Executive_100000	·	8/5/2019	8/12/2019	152,75 USD
2019/08 2019/08	1900131591 1900131692	610030 610030	Travel - Lodging Travel - Lodging	Travel & Entertainment 10 Travel & Entertainment 10			10100001	SWWC-Executive 100000		8/5/2019	8/12/2019	504 23 USD
2019/08	1900131658	610030	Travel - Lodging	Travel & Entertainment 10			10100001	SWWC-Executive_100000_ SWWC-Executive_100000_		8/9/2019 8/9/2019	8/12/2019 8/13/2019	337,48 USD 981 87 USD
2019/08	1900132491	610030	Travel - Lodging	Travel & Entertainment 10	010 8 KI	₹ 40	10100001	SWWC-Executive 100000		8/13/2019	8/30/2019	1,327 13 USD t
2019/09	100029616	610030	Travel - Lodging	Travel & Entertainment 10			10100001	SWWC-Executive 100000	P-Card Before Cut-Off - THE RITZ CARLTON	9/30/2019	9/30/2019	414 40 USD
2019/09 2019/09	1900133065 1900133067	610030 610030	Travel - Lodging Travel - Lodging	Travel & Entertainment 16 Travel & Entertainment 16			10100001	SWWC-Executive 100000 _ SWWC-Executive 100000		9/4/2019 9/5/2019	9/13/2019	184,25 USD 1;
2019/09	1900133413	610030	Travel - Lodging	Travel & Entertainment 16			10100001	SWWC-Executive 100000	,	9/20/2019	9/24/2019	1,204,45 USD ;
2019/10	1700002802	610030	Travel - Lodging	Travel & Entertainment 16			10100001	SWWC-Executive_100000	7.7000000000000000000000000000000000000	10/7/2019	10/25/2019	(1,261.76) USD
2019/10	1900134402	610030	Travel - Lodging	, Travel & Entertainment 1			10100001	SWWC-Executive _100000		10/7/2019	10/21/2019	, 123,17 USD
2019/10 2019/10	1900134577 1900134766	610030	Trayel - Lodging Trayel - Lodging	Travel & Entertainment 11 Travel & Entertainment 11			10100001	SWWC-Executive 100000 SWWC-Executive 100000	* **	9/27/2019 19/7/2019	10/23/2019	_1,261,76 USD _1,261,76 USD }
2019/10		610030	Travel - Lodging				10100001	SWWC-Executive_100000		10/25/2019	10/31/2019	2.805.63 USD
2019/01	. 1200001805	610030	, Travel - Lodgina	Travel & Enterlainment 1			10100001	SWWC-Executive 100000	K Michael ER Acquel	12/31/2018	1/1/2019	(500,00) USP .
2019/11	1900135668 1900135669		Travel - Lodging Travel - Lodging	Travel & Entertainment1 Travel & Entertainment _1			10100001	_SWWC-Executive_100000 SWWC-Executive_100000		11/6/2019	11/15/2019	202,58_USD_
2019/12	1900136859	610030	Travel - Lodging	Travel & Entertainment 1			10100001			11/5/2019	12/6/2019	1,180,90 USD 1 785,14 USD
2019/12		610030	Travel - Lodging	Travel & Entertainment _ ti		4040	10100001	SWWG-Executive_100000	·	11/22/2019	12/6/2019	898.35_USD
2019/12	1900137772	610030	Travel - Lodging	Travel & Entertainment 1			10100001	SWWC-Executive 100000		12/9/2019	12/20/2019	1,826 05 USD
2019/12	1900138115 1900123202	510030 610040	Travel - Lodging Meals & Entertainment (50% Deductible)	Travel & Enlectainment 11 Travel & Enlectainment 11			10100001	SWWC-Executive 100000 _SWWC-Executive _100000		12/12/2019 , 1/14/2019 .	12/31/2019	1,112,48 USD 153,36_USD
2019/01	1900123365	610040	Meals & Entertainment (50% Deductible)				10100001			1/18/2019	1/28/2019	294.18 USD.
2019/02	100027036	610040	Meals & Enterlainment (50% Deductible)				10100001		Rol R Rich ER Credit	2/28/2019	2/28/2019	25.69 USD
2019/02	1800124411	610040	Meals & Enlerteinment (50% Deductible) Meals & Entertainment (50% Deductible)				10100001	SWWC-Executive_100000 SWWC-Executive_100000	ment and the second	1/30/2D19 2/15/2019	2/20/2019 2/22/2019	72,07_USD
2019/02	1900125743	610040	Meals & Entertainment (50% Deductible)				1010001 1010001		21 - A - A - A - A - A - A - A - A - A -	2/15/2019	2/22/2019	96,48_USD
2019/04	100027799	610040	Meals & Entertainment (50% Deductible)	Travel & Entertainment _1	D104 \$	A _ 40	10100001	SWWC-Executive_100000 _	P-Card Before Cut-Off - TST VERITAS STEAK AND SE	4/30/2019	4/30/2019	2.1.18,58_USD
2019/04	100027799	610040	Meals & Entertainment (50% Deductible)				10100001	SWWC-Executive 100000	P-Gard Balore Cul-OttSQ SQUTHERN.MAID D	4/30/2019	4/30/2019	_ 40.90 USD _
2019/04	1900127091	610040	Meals & Enterlainment (50% Deductible) Meals & Enterlainment (50% Deductible)				10100001		7 X 2 4	4/12/2019 5/3/2019	4/25/2019	27.61, USD
2019/05	1900127940	610040	Meals & Entertainment (50% Deductible)			7	10100001		es k anadas en mistribito mente mente mente mente mente de mente de mente de mente de mente de mente de mente de	5/8/2019	5/9/2019 5/17/2019	60.29_USD
2019/05	1900127942	610040	Meals & Entertainment (50% Deductible)				10100001	SWWC-Executive 100000	cece a r vitrat a cit	5/8/2019	5/17/2019	. 49.59 USD
2019/05	1900127946	610040	Meals & Entertainment (50% Deductible)					_SWWC-Executive_100000 _	·	5/10/2019	5/17/2019	28,80_USD
2019/05 2019/06	190D128543 190D129797	610040 610040	Meals & Entertainment (50% Deductible). Meals & Entertainment (50% Deductible).					. SWWC-Executive _100000 SWWC-Executive 100000		. 5/28/2019 ·	.,	1,218,70 USD 1
2019/07	900131018	610040						SWWC-Executive_100000		7/3/2019	7/29/2019	58 82_USD
2019/08	1900131509	610040	Meals & Enlertainment (50% Deductible)					SWWC=Executive_100000		7/26/2019	8/7/2019	209.76_USD
2019/08	1900131569	610040 610040 _	Meals & Entertainment (50% Deductible) Meals & Entertainment (50% Deductible)				10100001	SWWC-Executive_100000 .		, 8/2/2D19 ,	, 8/9/2D19	
2019/08 2019/08	1900131589 1900131658	610040	Meals & Entertainment (50% Deductible) Meals & Entertainment (50% Deductible)	AMMINIATION OF THE PROPERTY OF THE PARTY OF		* *******		SWWC-Executive 100000			8/12/2019 8/13/2019	310.00 USD
2019/08	1900132491	610040	Meals & Enterteinment (50% Deductible)	Travel & Entertainment 1	010 8 K		10100001		to a source			231,81 USD
2019/09	100029564	610040	Meals & Entertainment (50% Deductible)	Travel & Entertainment_1	0109.S	A., 40	10100001	SWW.D-Executiva100000	SO THE SWEET BOUTIOUE BA	9/30/2019	9/30/2019	145 00_USD

Attachment OPUC 1-9.1

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2019/09		100029616	610040		Travel & Entertainment Travel & Entertainment		9 SA 40 9 SA 50		SWWC-Executive 100000 SWWC-Executive 100000	P-Card Before Cut-Off - THE RITZ CARLTON P-Card Before Cut-Off - THE RITZ CARLTON	9/30/2019	9/30/2019	4,097 60 USD
2019/09		100029616	610040	Meals & Entertainment (50% Deductible) Meals & Entertainment (50% Deductible)	Travel & Entertainment		9 KR 40	10100001	SWWC-Executive 100000		9/30/2019 · 9/4/2019	9/30/2019 9/13/2019	(556 29) USD 1,682 49 USD
2019/09		1900133067	610040	Meals & Entertainment (50% Deductible)	Travel & Entertainment		9 KR 40		SWWC-Executive 100000	O DO DESCRIPTION OF 10 10 10 10 10 10 10 10 10 10 10 10 10	9/5/2019	9/13/2019	437.59 USD
2019/10		1700002802	610040	Meals & Entertainment (50% Deductible)	Travel & Entertainment		10 KA 50	10100001	SWWC-Executive 100000		10/7/2019	10/25/2019	(2,322 87) USD
2019/10		1900134402	810040	Meals & Enlertainment (50% Deductible)	Travel & Entertainment	1010	10 KR 40	10100001	SWWC-Executive 100000		10/7/2019	10/21/2019	721.42 ÙSD
2019/10		1900134577	610040	Meals & Entertainment (50% Deductible)	Travel & Entertainment		10 KR 40		SWWC-Executive 100000		9/27/2019	10/23/2019	2,322.87 USD
2019/10		1900134766	610040	Meals & Entertainment (50% Deductible)	Travel & Entertainment,		10 KR 40		SWWO-Executive 100000		10/7/2019	10/25/2019	2,322,87 USD
2019/10		1900135077	610040	Meals & Entertainment (50% Deductible)	Travel & Entertainment		10 KR40	10100001	SWWC-Executive 100000		10/25/2019	10/31/2019	27 05 USD
2019/10		1900135079 1900135668	610040	Meals & Entertainment (50% Deductible) Meals & Entertainment (50% Deductible)	Travel & Entertainment		10 KR 40	10100001	SWWC-Executive 100000 SWWC-Executive 100000	and the control of th	10/28/2019 11/6/2019	10/31/2019	1,698 15 USD 711 60 USD
2019/11	*	1900135669	610040	Meals & Entertainment (50% Deductible)	Travel & Entertainment		11 KR 40	10100001	SWWC-Executive 100000	v	11/5/2019	11/15/2019	436,26 USD
2019/12	~~~~~~~~~~~~~~~~~~~~~~~~~~~~~~~~~~~~~~	1900136859	610040	Meals & Entertainment (50% Deductible)	Travel & Entertainment		12 KR 40		SWWC-Executive 100000		11/25/2019	12/6/2019	1,140 58 USD
2019/12		1900136867	610040	Meals & Entertainment (50% Deductible)	Travel & Entertainment	1010	12 KR 40	10100001	SWWC-Executive 100000		11/22/2019	12/6/2019	,702,22 USD
2019/12		1900138115	610040	Meals & Entertainment (50% Deductible)	Travel & Entertainment		12 KR 40	10100001	SWWC-Executive 100000		12/12/2019	12/31/2019	5,09455 USD
2019/01		1200001805	610040	Meals & Entertainment (50% Deductible)	Travel & Entertainment		1 ZB 50	10100001	SWWC-Executive 100000	K Michael ER Accrual	12/31/2018	1/1/2019	(200,00) USD
2019/01		1900122337 1900123202	610060 610060	Meals - On Premise Meals - On Premise	Travel & Entertainment Travel & Entertainment		1 KR 40 1 KR 40	10100001	SWWC-Executive 100000		1/10/2019	1/17/2019	25 84 USD 18 06 USD
2019/01		1900123438	610060	Meals - On Premise	Travel & Entertainment		1 KR 40	10100001	SWWC-Executive 100000	***********	1/24/2019	1/29/2019	31401 USD
2019/02		1900124014	610050	Mesis - On Premise	Travel & Entertainment		2 KR 40	10100001	SWWC-Executive 100000		2/1/2019	2/11/2019	118,79 USD
2019/02		1900124411	610060	Meals - On Premise	Travel & Entertainment		2 KR 40	10100001	SWWC-Executive 100000	, , ,	1/30/2019	2/20/2019	109 02 USD
2019/02		1900124517	610060	Meals - On Premise	Travel & Entertainment		2 KR 40	10100001	SWWC-Executive 100000		2/15/2019	2/22/2019	60,76 USD
2019/02		1900124518	610060	Meals - On Premise	Travel & Entertainment		2 KR40	10100001	SWWC-Executive 100000		2/15/2019	2/22/2019	82 61 USD
2019/03		1900124984	610060	Meals - On Premise	Travel & Entertainment		3 KR 40 3 KR 40	10100001	6WWC-Executive 100000		2/6/2019	3/8/2019	377.46 USD
2019/03		1900124985 1900125281	610060	Meals - On Premise Meals - On Premise	Travel & Entertainment Travel & Entertainment		3 KR 40	10100001	SWWC-Executive 100000 SWWC-Executive 100000		2/25/2019 3/8/2019	3/6/2019	316 50 USD '
2019/03	•	1900125281	610060	Meals - On Premise	Travel & Entertainment		3 KR 40	10100001	SWWC-Executive 100000	* * * * * * * * * * * * * * * * * * * *	3/5/2019	3/25/2019	200 40 USD 48 17 USD
2019/03		1900125743	610060	Meals - On Premise	Travel & Entertainment		3 KR 40		SWWC-Executive 100000	* * *	3/14/2019	3/25/2019	36,35 USD
2019/03		1900125747	610060	Meals - On Premise	Travel & Entertainment		3 KR 40		SWWC-Executive 100000		3/14/2019	3/25/2019	92 74 USD
2019/03		1900125889	610080	_ Meals - On Premise	Travel & Entertainment		3 KR , 40	10100001			3/20/2019	3/27/2019	310.01 USD
2019/03		1900126016	610060	Meals - On Premise	Travel & Entertainment		3 KR 40	10100001	SWWC-Executive 100000		3/25/2019	3/28/2019	112 74 USD
2019/04		1900128171	610060 610060	Meals - On Premise Meals - On Premise	Travel & Entertainment, Travel & Entertainment		, 4 KR 40 4 KR 40	10100001		* **	. 4/3/2019	4/2/2019	, 2,366,47 USD
2019/04		1900126907	610060	Meals - On Premise Meals - On Premise	Travel & Entertainment		4 KR 40	10100001	SWWC-Executive 100000		4/18/2019 4/12/2019	4/23/2019 4/25/2019	6475 USD 5892 USD
2019/04		1900127094	610060	Meals - On Premise	Travel & Entertainment		4 KR 40	10100001	SWWC-Executive 100000		4/12/2019	4/25/2019	46 78 USD :
2019/04		1900127139	610060	Meals - On Premise	Travel & Entertainment		4 KR 40	10100001	SWWC-Executive_100000		4/23/2019	4/29/2019	403,41 USD
2019/05		100028204	_610060	Meals - On Premise	Travel & Entertainment		_ 5 SA40	10100001	SWWC-Executive 100000	SQ SOUTHERN MAID D	5/31/2019	5/31/2019	51 84 USD
2019/05		1700002708	610060	Meals - On Premise ,	_Travel & Entertainment		5 KA 50	10100001	_SWWC-Executive_100000		5/28/2019	., 5/30/2019	(30.12) USD
2019/05		1900127724	610060 610060	Meals - On Premise Meals - On Premise	Travel & Entertainment Travel & Entertainment		5 KR , 40 5 KR 40	10100001	SWWC-Executive 100000 SWWC-Executive 100000		5/3/2019 4/29/2019	5/9/2019 5/17/2019	171 45 USD 29.64 USD
2019/05		1900127938 1900127944	610060	Meals - On Premise Meals - On Premise	Travel & Entertainment		5 KR 40	10100001	SWWC-Executive 100000	*	5/10/2019	5/17/2019	30 39 USD
2019/05		1900127946	610060	Meals - On Premise	Travel & Entertainment		5 KR 40	10100001		w	5/10/2019	5/17/2019	81.51 USD . '
2019/05		1900128430	610060	Meals - On Premise	Travel & Entertainment		5 KR 40	10100001			5/19/2019	5/29/2019	102 57_USD
2019/05		1900128491	610060	Meals - On Premise	Trave) & Entertainment	1010	5 K/R 40	10100001		A STATE OF THE PROPERTY OF THE	5/28/2019	5/30/2019	, 30,12 USD ,
2019/05		1900128543	610060	Meals - On Premise	Travel & Eptertainment		5 KR 40	10100001	SWWC-Executive 100000		5/28/2019	5/31/2019	18,99 USD
2019/06		100028561	610060	Meals - On Premise	Travel & Entertainment Travel & Entertainment		6_SA40 6 KR 40	10100001	SWWC-Executive 100000	OTTO S BARBEQUE AND HAMBU	6/30/2019	6/30/2019	235,20 USD
2019/06	•		610060 610060	Meals - On Premise Meals - On Premise	Travel & Entertainment		6 KR 40	. 10100001 10100061	SWWC-Executive 100000	¥ .	5/28/2019	6/10/2019 6/11/2019`_	419,20 USD 70.52 USD
2019/06		1900126995	610060	Meals - On Premise	Travel & Entertainment		_ 6 KR40	10100001	SWWC-Executive 100000	en nin in the interaction of the	6/5/2019	6/11/2019	1661 USD
2019/06		1900129222	810060	Meals - On Premise	Travel & Entertainment	1010	. 6 KR 40	10100001	SWWC-Executive 100000		6/7/2019	6/17/2019	
2019/06		1900129223 , ,	610060	Meşls - On Premise	Travel & Entertainment	1010	6,KR 40		, SWWC-Executive ,100000 .	8/11/19/19/19/19/19/19/19/19/19/19/19/19/	6/10/2019	6/17/2019	4,30 UŞD
2019/06		1900129458	610060	Meals - On Premise	Travel & Entertainment		6 KR40		SWWC_Executive_100000		8/5/2019	6/20/2019_	180,41_USD
2019/06		1900129553	610060	Meals - On Premise	Travel & Entertainment_		6_KR40		SWWC-Executive 100000	06/24/19	6/24/2019	6/24/2019	75,10 USD
2019/06		1900129592	.610060 , _610060 _	Meals - On Premise	Travel & Entertainment . Travel & Entertainment		6 KR , 40	10100001	, SWWC-Executive 100000 . SWWC-Executive 100000			6/25/2019 6/28/2019	28.04 USD
2019/06			610060	Meals - On Premise	fravel & Enlerainment		5 KR 40	10100001	SWWC-Executive 100000	· · · · · · · · · · · · · · · · · · ·	6/24/2019	6/30/2019	28.04_USD
2019/09		1900130775	610060	Meals - On Premise	Travel & Entertainment		7 KR 40		SWWG-Executive 100000		7/17/2019	7/23/2019	76,86 USD
2019/07		_1900130776	610060	Meals - On Premise	_Travel & Entertainment.		7_KR40	10100001	SWWC-Executive_100000		7/19/2019	7/23/2019	82.58 USD
2019/07		1900131018	610060	Meals - On Premise	Travel & Entertainment		7 KR 40	10100001			, 7/3/2019	7/29/2019	102,37 USD '
2019/08		1900131507	610060	Meals - On Premise	Travel & Entertainment		. B KR 40	. 10100001			7/31/2019	8/7/2019	
2019/08			610060	Meals - On Premise	Travel & Entertainment		8_KR40 8 KR40	10100001 10100001	SWWC-Executive 100000	*** *** **** * *** *** *** *** *** ***	7/26/2019	8/7/2019 8/9/2019	38,58 USD 1
2019/08	,	1900131569 1900131586	610060	Meals - On Premise	Travel & Entertainment Travel & Entertainment		8 KR40 8 KR _ 40	1,0100001		w w . C . A 3 W . W	8/2/2019 ' 8/5/2019	8/12/2019	33,47 USD ,
2019/08		1900131591	610060	Meals : On Premise	Travel & Entertainment		8 KR 40		_SWWC-Executive_100000			%(12/2019 	11.97 USD
2019/08	*******************************	1900131658	610060	Meals - On Premise	Travel & Entertainment		. 8 KR 40	.10100001			8/9/2019	8/13/2019	38.00 USD
2019/08		1900132386	, 610060 .	Meals - On Premise	. Travel & Entertainment		8 KR 40	10100001	SWWC-Executive, 100000	An a man a an anathrican		8/28/2019,	
2019/08		_1900132491	610060	Meals - On Premise	. Trayel & Entertainment		_8 KR40		_ SWWC-Executive_100000		8/13/2019	8/30/2019_	161.06 _USD
2019/09		100029616	6100EQ ,	Meala - On Premise	Travel & Entertainment		9 SA 40	10100001		P-Card Before Cut-Off - THE RITZ CARLTON	9/30/2019	9/30/2019	56 59 USD . ;
2019/09	•	1900133065	610060	Meals - On Premise Meals - On Premise	Travel & Entertainment Travel & Entertainment		9 KR 40	10100001	SWWC-Executive 100000 SWWC-Executive 100000		9/4/2019 9/5/2019	9/13/2019	. 142.93 USD ;
.20,19/09 20,19/09		1900133067 1900133413	610060 610060	Meals - On Premise	"Travel & Entertainment, Travel & Entertainment		9 KR 40		SWWC-Executive_100000		9/5/2019	9/24/2019	65.40_USD:
2019/09		1700002802	610060.	Menia - On Premise	Travel & Entertainment		10 KA 50		SWWC-Executiva_100000	land share a second substance and second as a second second		10/25/2019	
2019/10		1900134402	_610060	Meals - On Premise	_Travel & Entertainment		_ 10 KR40		SWWC-Executive _100000		10/7/2019	10/21/2019	14.97_USD
2019/10		1900134577、	610060	Meals - On Premise	Travel & Enlettalriment	1010 .	. 10 KR 40	101000D1	SWWC-Executive_100000		9/27/2019	10/23/2019	338 85 USD
2019/10		1900134766	610060	Meals - On Premise	Travel & Entertainment		, 10 KR 40	10100001			10/7/2019	10/25/2019	338,85 USD
2019/10			610060	Meals - On Premise	Travel & Entertainment.		10,KR30		9WWC-Executive_100000	over recovered to a forest to the telescope of the state	10/25/2019	10/31/2019	11.b4_USD!
2019/10		1900135079 1900135869	610060	Meals - On Premise	Travel & Entertainment Travel & Entertainment		10_KR40		SWWC-Executive_100000		10/28/2019	10/31/2019	496.71_USD
2019/11		1,900,135669 1900,136859.	610060	Meals - On Premise Meals - On Premise	Travel & Entertainment		11 K/K . 4// 12 KR 40		SWWC-Executive 100000		11/5/2019	12/6/2019.	205.31 USD

Yearmonth := WBB clamant = C	1900136867	610060	Meals - On Premise	Travel & Enlertainment 1010	1los (Se Type			GC Name Profit Cent 8WWG-Executive 100000		0) (e Po /22/2019	12/6/2019	Amounts Raures 95,89 USD
2019/12	1900136867	610060	Meals - On Premise	Travel & Entertainment 1010	12 KR			SWWC-Executive 100000		2/9/2019	12/20/2019	124 57 USD
2019/12	1900138115	510b60	Meals - On Premise	Travel & Entertainment 1010	12 KR			SWWC-Executive 100000		2/12/2019	12/31/2019	65,84 USD
2019/12	1200002064	610060	Meals - On Premise	Travel & Entertainment 1010	12 ZA			SWWC-Executive 100000		731/2019	12/31/2019	98 00 USD
2019/01	1200001805	610070	Travel - Transportation	Travel & Entertainment 1010	1 ZB		10100001	SWWC-Executive 100000		/31/2018	1/1/2019	OZU (00.003,1)
2019/01	1200001805	610070	Travel - Transportation	Travel & Entertainment 1010	1 ZB		10100001	SWWC-Executive 100000		/31/2018	1/1/2019	(300 00) USD
2019/01 2019/01	1900122085 1900122337	610070 610070	Travel - Transportation Travel - Transportation	Travel & Entertainment 1010 Travel & Entertainment 1010	1 KR 1 KR		101000b1 10100001	SWWC-Executive 100000 SWWC-Executive 100000		/10/2019	1/14/2019 1/17/2019	1,495,40 USD 2,445 42 USD
2019/01	1900122337 1900123202	610070	Travel - Transportation	Travel & Ententinment 1010	1 KR			SWWC-Executive 100000		/14/2019	1/23/2019	181,97 USD
2019/01	1900123365	610070	Travel - Transportation	Travel & Entertainment 1010	1 KR		10100001			/18/2019	1/28/2019	360 34 USD
2019/02	100027036	610070	Travel - Transportation	Travel & Entertainment 1010	2 SA		10100001	6WWC-Executive 100000	Rol R Rich ER Credit 2	/28/2019	2/28/2019	(86,00) USD
2019/02	1900124014	610070	Travel - Transportation	Travel & Entertainment 1010	2 KR	_40	10100001	SWWC-Executive 100000		2/1/2019	2/11/2019	36 82 USD
2019/02	1900124411	610070	Travel - Transportation	Travel & Entertainment 1010	2 KR		10100001	SWWG-Executive 100000		130,2019	2/20/2019	
2019/02	1900124517	610070 610070	Travel - Transportation	Travel & Entertainment 1010 Travel & Entertainment 1010	2 KR		10100001	SWWC-Executive 100000 SWWC-Executive 100000		2/15/2019 2/15/2019	2/22/2019	754 13 USD
2019/02 2019/03	1900124518 1900125337	610070	Travel - Transportation Travel - Transportation	Travel & Entertainment 1010	2 KR 3 KR		10100001	SWWC-Executive 100000		3/7/2019	2/22/2019 3/13/2019	656,78 USD ;
2019/03	1900125741	610070	Travel - Transportation	Travel & Entertainment 1010	3 KR		10100001	SWWC-Executive 100000		3/5/2019	3/25/2018	852 53 USD
2019/03	1900125747	610070	Travel - Transportation	Travel & Entertainment 1010	3 KR	40	10100001	SWWC-Executive 100000	3.	3/14/2019	3/25/2019	715 54 USD 1
2019/03	1900126016	810070	Travel - Transportation	Travel & Entertainment 1010	3 KR		10100001	SWWC-Executive 100000		3/25/2019	3/28/2019	832.60 USD
2019/04	1900126907	610070	Travel - Transportation	Travel & Entertainment 1010	4 KR		10100001	SWWC-Executive 100000		1/18/2019	4/23/2019	690 94 USD
2019/04	1900127091	610070 610070	Travel - Transportation	Travel & Entertainment 1010 Travel & Entertainment 1010	., 4 KR 4 KR		10100001	SWWC-Executive 100000 SWWC-Executive 100000		V12/2019	4/25/2019	253,00 USD 1
2019/04	1900127094	610070	Travel - Transportation Travel - Transportation	Travel & Entertainment 1010	5 KA		10100001	SWWC-Executive 100000		1/12/2019 5/28/2019	5/30/2019	(1,994 69) USD
2019/05	1900127724	610070	Travel - Transportation	Travel & Entertainment 1010	5 KR		10100001	SWWC-Executive 100000		5/3/2019	5/9/2019	567 01 USD
2019/05	1900127937	610070	Travel - Transportation	Travel & Entertainment 1010	5 KR	40	10100001	SWWC-Executive_100000	4	1/29/2019	5/17/2019	607.11 USD
2019/05	1900127938	610070	Travel - Transportation	Travel & Entertainment 1010	5 KR		10100001	SWWC-Executive 100000		1/29/2019	5/17/2019	1,463 08 USD
2019/05	1900127939	610070	Trevel - Transportation	Travel & Enlettainment 1010	5 KR		10100001	SWWC-Executive_100000		5/1/2019	5/17/2019	1,451 20 USD
2019/05 2019/05	1900127946 1900126430	610070	Travel - Transportation Travel - Transportation	Travel & Entertainment 1010 Travel & Entertainment 1010	5 KR 5 KR	'~	10100001	SWWC-Executive 100000 SWWC-Executive 100000		5/10/2019 5/19/2019	5/17/2019 5/29/2019	5,346,19 USD 1,256,06 USD
2019/05	1900128491	610070	Travel - Transportation	Travel & Entertainment 1010	5 KR		10100001	SWWC-Executive 100000		5/28/2019	5/30/2019	1.994 89 USD
2019/05	1900126543	610070	Travel - Transportation	Travel & Entertainment 1010	5 KR		10100001	SWWC-Executive_100000		728/2019	5/31/2019	629.37 USD
2019/06	1900128995	610070	Travel - Transportation	Travel & Entertainment 1010	6 KR		10100001	SWWC-Executive 100000		6/5/2019	6/11/2019	1,169 21 USD]
2019/06 .	1900128998	610070	Travel - Transports(lon	Trayel & Entertainment 1010	B KR		10100001	SWWC-Executive 100000		6/5/2D19	6/11/2019	184 95 USD
2019/06	1900129220	610070	Travel - Transportation	Travel & Entertainment 1010	6_KR	_40 __	10100001	SWWC-Executive 100000		6/5/2019	6/17/2019	187 89_ USD
2019/06	1900129221 1900129222	610070 610070	Travel - Transportation Travel - Transportation	Travel & Entertainment 1010 Travel & Entertainment 1010	6 KR	40 40	10100001	SWWC-Executive 100000, SWWC-Executive 100000		6/5/2019 6/7/2019	6/17/2019	37,47 USD 673,16 USD
2019/06	1900129222	610070	Travel - Transportation	Travel & Entertainment 1010	6 KR		10100001	SWWC-Executive 100000		3/10/2019	6/17/2019	1.59B.02 USD :
2019/06	1900129342	610070	Travel - Transportation	Travel & Entertainment 1010	6 KR		10100001	SWWC-Executive 100000		5/10/2019	6/18/2019	348 00 USD
2019/06	1900129592	610070	Travel - Transportation	Travel & Enterteinmenf 1010	6 KR		1000001	SWWC-Executive 100000		5/26/2019	6/25/2019	755,63 USD
2019/06	1900129797	610070	Travel - Transportation	Travel & Entertainment 1010	_ 6 KR_		10100001	SWWC-Executive 100000	The second and the se	6/17/2019	6/28/2019	2,015,17 USD
2019/06	1900129861	610070	Travel - Transportation	Trevel & Entertainment 1010	6 KR	40	10100001	SWWC-Executive 100000		B/24/2019 , ,	6/30/2019	311.73 USD,
2019/07 2019/08	1900131018 1900131507	610070 610070	Travel - Transportation	Travel & Entertainment 1010 Travel & Entertainment 1010	7 KR 8 KR		10100001	SWWC-Executive 100000 SWWC-Executive 100000		7/3/2019 7/31/2019	7/29/2019 8/7/2019	1,025,47 USD 641,67 USD
2019/08	1900131509	610070	Travel - Transportation	Travel & Entertainment 1010	8 KR		10100001	SWWC-Executive 100000		7/26/2019	8/7/2019	1,147,17 USD
2019/08	1900131669	610070	Travel - Transportation	Travel & Entertainment 1010	8 KR		10100001	SWWC-Executive 100000		8/2/2019	8/9/2019	1,339,56 USD
2019/08	1900131586	610070	Travel - Transportation	Travel & Entertainment_1010	8 KR		_10100001	SWWC-Executive 100000		8/5/2019	8/12/2019	1,053,92_USD
2019/08	1900131567	610070	Travel - Transportation	Travel & Entertainment 1010	B KR	40	10100001	SWWC-Executive 100000		8/5/2019	8/12/2019	1.488,12 USD /
2019/08 2019/08	, 1900131589 1900131591	, 610070 610070	, Travel - Transportation Travel - Transportation	Trayel & Entertainment 1010 Travel & Entertainment 1010	8 KR 8 KR		10100001	SWWC-Executive 100000 , SWWC-Executive 100000		.6/5/2019 8/5/2019	8/12/2019 8/12/2019	823,47 USD 682,72 USD
2019/08		610070	Travel - Jransportation	Travel & Entertainment 1010	8 KR	40		SWWC-Executive 100000		8/5/2019	8/12/2019	1,524.75_USD
2019/08	1900131658	610070	Travel - Transportation	Travel & Enlerteinment 1010	8 KR	40	10100001			8/9/2019	. 8/13/2019	1,173,17 USD
2019/08	1900132491	610070	Travel - Transportation	Travel & Entertainment 1010	8 KR	40	10100001	SWWC-Executive_100000	8	8/13/2019	8/30/2019	426,85_USD
2019/09	100029560	610070	Trayel - Transportalion	_ Travel & Enlertainment _1010	, 9 SA		101000D1	SWWC-Executive 100000		9/30/2019	9/30/2019	690,53 USD
2019/09	100029616	610070	Trayet - Transportation	Trayer & Entertainment 1010	9 SA		10100001			9/30/2019	9/30/2019	226.00 USD
2019/09	1900133085 1900133067	610070	Travel - Transportation	Travel & Eptentainment 1010 Travel & Entertainment 1010	9.KR	40	10100001	SWWC-Executive_100000 SWWC-Executive_100000		9/4/2019	9/13/2019	2,502,01 USD
2019/09	1900133413	610070	Travel - Transportation	Travel & Entertainment 1010	9 KR.		10100001	SWWC-Executive 100000		9/3/2019	9/24/2019	467,19 USD
2019/10	1700002802	610070 _	Travel - Transportation	Travel & Entertainment_1010	10_KA	50	10100001	SWWC-Executive_ 100000		10/7/2019	10/25/2019	(2,098,71)_USD
2019/10	1900134402	610070	Travel - Transportation	Travel & Entertainment, 1010	10 KB	40	10100001	SWWC-Executive 100000		10/7/2019	10/21/2019	1.535.78 USD
2019/10	1900134577,	610070	Travel - Transportation	Travel & Entertainment 1010	10 KR	40	10100001			9/27/2019	10/23/2019	2,096,71 USD
2019/10	1900134766	610070 610070	Travel - Transportation	Travel & Entertainment_1010 Travel & Entertainment_1010	10_KR 10_KR	40		SWWC-Executive_100000 SWWC-Executive_100000		1 <i>0/7/2</i> 019 0 <i>/25/2</i> 019	10/25/2019	2,096 71_USD
2019/11	1900135077	610070	Travel - Transportation	Travel & Entertainment 1010	11 KR .	40		SWWC-Executive 100000		11/6/2019	11/15/2019	2,643,42_USD 1,463,60_USD
2019/11	1900135669	610070	TravelTransportation	Travel & Enlegalment_1010	J1 KR	40		_ SWWC-Executive 100000		11/5/2019	11/15/2019	3.037_19_USD
2019/12	1900136859	510070	Travel - Transportation	Travel & Entertainment 1010	12 KR	40	10100001	SWWC-Executive 100000	11	1/25/2019	12/6/2019	1,573,79 USD
2019/12 .	1900136867	610070	Travel - Transportation .	.Travel & Entertainment 1010	. 12 KR	40	10100001			1/22/2019	12/6/2019 .	. 862,15 ,USD ,i
2019/12	1900137772	, 610070	Travel - Transportation	Travel & Entertainment 1010	12.KR	40		SWWC-Executive_100000		12/9/2019	12/20/2019	4.321.69_USD
2019/12 2019/12	1900138115	610070 610090	Travel - Transportation Travel - Other	Travel & Enlectainment 1010 Travel & Enlectainment 1010	12 KR 12 ZA	40	10100001	SWWC-Executive 100000 SWWC-Executive 100000		2/12/2019 2/31/2019	12/31/2019 12/31/2019	201,55 USD 280.19 USD
2019/01	1200002084 .,	610090	Travel - Other	Trayel & Entertainment_1010	1_KR	40	_10100001	SWWC-Executive_100000		1/10/2019	1/17/2019	120,00_USD
2019/01	1900123365	610090	Travel - Other	Travel & Enlertainment 1010	1. KR	40	_10100001	SWWC-Executive_100000		1/18/2019	1/28/2019	_17.00_USD
2019/02	1900124014	610090	Travel - Other	Travel & Enlertainment 1010	.2 KR	40		SWWC-Executive 100000		2/1/2019	2/11/2019	89 00, USD
2019/02	1900124411	610090	Travel - Olher	Travel & Enterteinment_1010	2_KR	40	_10100001	SWWC-Executive 100000		1/30/2019	2/20/2019	218.35_USD
2019/02	1900124518	610090	Travel - Other	Travel & Entertainment 1010	2_KR	40		SWWC_Executive_100000		2/15/2019	2/22/2019	222.55_USD
2019/03	1900125741	610090	Travel - Other	Travel & Enlettalnment 1010 Travel & Enlettalnment 1010	3 KR	40 40	10100001	SWWC-Executive 100000		.3/5/2019 . 3/14/2019	3/25/2019	.312.28_USO; 113.00 USD ;
2019/03	1900125747	610090_	Travel - Other	Travel & Entertainment 1010	3.KR.		10100001			3/14/2019	3/25/2019	120 00, USD
2019/04	1900127094	610090	Travel - Other	Travel & Entertainment , 1010	4 KR	40	10100001	SWWC-Executive 100000		4/12/2019	4/25/2019	
2019/05	100028278	610090	Travel - Other	Travel & Entertainment_1010	5.\$A	40	101/00/01	SWWC-Executive_100000	Rol R. Rich, ER.	5/31/2019	5/31/2019	15.90_USDi

Attachment CDE-D Page 5 of 5

Attachment OPUC 1-9.1

Page 4 of 4

Yearmonth Was elec	nentz : Order - s Document Number	. anl Accoun	it & G/E Desription = 2	s in Concession of Expense of Ex	Period & Type 🐭	AT PERSON	Gost Gize	CC Name - Profit Center	Text Sales Andrews and Association Control	ient Date 🧼 Po	osting Date 🐼 L	C Amount & Lours
2019/05	1700002708	610090	Travel - Other	Travel & Entertainment 1010	5 KA 5	50 ·	10100001	SWWC-Executive 100000		5/28/2019	5/30/2019	(80 00) USD
2019/05	1900127724	610090	Travel - Other	Travel & Entertainment 1010	5 KR 4	10	10100001	SWWC-Executive 100000		5/3/2019	5/9/2019	135,00 USD
2019/05	1900127944	610090	Travel - Other	Travel & Enlertainment 1010	5 KR 4	40 ·	10100001	SWWC-Executive 100000		5/10/2019	5/17/2019	372 32 USD
2019/05	1900127946	610090	Travel - Other	Travel & Entertainment 1010	5 KR 4	40 ·	10100001	SWWC-Executive 100000		5/10/2019	5/17/2019	160.00 USD
2019/05	1900128430	610090	Travel - Other	Travel & Entertainment 1010	5 KR 4	10	10100001	SWWC-Executive 100000	· · · · · · · · · · · · · · · · · · ·	5/19/2019	5/29/2019	49 00 USD
2019/05	1900128491	61009d	Travel - Other	Travel & Entertainment 1010	5 KR 4	(O))))	10100001	SWWC-Executive 100000	(33) 701 (1)	5/28/2019	5/30/2019	80 DO USD
2019/05	1900128543	610090	Travel - Other	Travel & Entertainment 1010	5 KR 4	10	10100001	SWWC-Executive 100000		5/28/2019	5/31/2019	87 00 USD
2019/06	1900128995	610090	Travel - Other	Travel & Entertainment 1010	6 KR 4	10	10100001	SWWC-Executive 100000	· .	6/5/2019	6/11/2019	72.00 USD
2019/06	1900128996	610090	Trayel - Other	Travel & Entertainment 1010	6 KR 4	10	10100001	SWWC-Executive 100000		6/5/2019	6/11/2019	379 74 USD 1
2019/06	1900129222	610090	Travel - Other	Travel & Entertainment 1010	6 KR 4	10	10100001	SWWC-Executive 100000		6/7/2019	5/17/2019	183 00 USD
2019/06	1900129223	610090	Travel - Other	Travel & Entertainment 1010	6 KR 4	10	10100001	SWWC-Executive 100000		6/10/2019	6/17/2019	24 00 USD ,
2019/07	1900131018	610090	Travel - Other	Travel & Enlertainment 1010	7 KR 4	40	10100001	SWWC-Executive 100000		7/3/2019	7/29/2019	128 00 USD
2019/08	1900131507	610090	Travel - Other	Travel & Entertainment 1010	8 KR 4	10	10100001	SWWC-Executive 100000	•	7/31/2019	8/7/2019	54 00 USD
2019/0B	1900131509	610090	Travel - Other	Travel & Entertainment 1010	8 KR4	10		SWWC-Executive_100000		7/26/2019	8/7/2019	80,00 USD
2019/08	1900131569	510090	Travel - Other	Travel & Entertainment 1010	8 KR 4	10	10100001	SWWC-Executive 100000		8/2/2019	8/9/2019	24 00 USD
2019/08	1900132491	610090	Travel - Other	Travel & Entertainment 1010	8 KR 4	10	10100001	SWWC-Executive_100000	,	8/13/2019	8/30/2019	89,04 USD
2019/09	100029616	610090	Travel - Other	Travel & Entertainment, 1010	9 \$A 4	10	10100001	SWWC-Executive 100000	P-Card Before Cut-Off - THE RITZ CARLTON	9/30/2019	9/30/2019	59 92 USD
2019/09	1900133065	610090	Travel - Other	Travel & Entertainment 1010	9 KR4	4n	101000001	SWWC-Executive_100000		9/4/2019	9/13/2019	57.36 USD_1
2019/09	1900133067	610090	Travel - Other	Travel & Entertainment 1010				SWWC-Executive 100000		9/5/2019	9/13/2019	318 99 USD .
2019/10	1700002802	610090	Trayel - Other	Travel & Enjertalriment 1010	10 KA _ 5	50		SWWC-Executive 100000		10/7/2019	10/25/2019	(151,20) USD
2019/10	1900134402	610090	Travel - Other	Travel & Entertainment 1010	10 KR 4	40	10100001	SWWC-Executive 100000		10/7/2019	10/21/2019	281 79 USD
2019/10	1900134577	610090	Travel - Other	Trayel & Enlertainment 1010	10 KR	40 <u> </u>	10100001	SWWC-Executive_100000	a second south that the second or on a	9/27/2019	10/23/2019	151,20 USD
2019/10	1900134766	610090	Travel - Other	_ Travel & Entertainment 1010	10 KR_ 4	40 _	10100001	SWWC-Executive 1000000		10/7/2019	10/25/2019	151,20 USD
2019/11	1900135669	_610090	Travel - Other	Travel & Entertainment_1010	11_KR -	40 ,	10100001	SWWC_Executive_100000	777 R Y 10 R 2 MARKETT NO. 10 M. 10 C 10 MARK 1 M. 10	11/5/2019	11/15/2019	221.60 USD
2019/12	1900136859	610090	Travel - Other	Travel & Entertainment, 1010	12 KR 4	40	10100001	SWWC-Executive 100000		11/25/2019	12/6/2019	48 00 USD
2019/12	1900137772	610090	Travel - Other	Travel & Entertainment 1010		40 ,	10100001	SWWC-Executive 100000	man M	12/9/2019	12/20/2019	179.05 USD
2019/12	1900138115	610090	Travel - Other	Travel & Entertainment 1010	12 KR 4	40	10100001	SWWC-Executive 100000		12/12/2019	12/31/2019	178 08 USD
Total												141,876,04 x

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TX Growth; Strategy Medting

Stella Westin Austin 310 East 5th St (512) 391-2333

930990183 SSJ

CHK 5269 TBL 5171 GST 2 12/9/2019 5:55 PM

6.00 T2 f Bud Light BIL 0.00 1 Glass 1 Macallan 12 16,00 T2

Subtotal: \$22,00 Alochol Tax \$1.82 Total Due: \$23.82 # XXXXXXXXXXX4009:

AMEX 801724 Auth 23,82 Stelle Bar ŤΧ

51/1 TABLE 938990183/\$8J SERVER CHECK# 5269

2019/12/09 05:24:07 *****Author1ze****

MERG: ID:0010600008029240994564 RFF No: 1210002407 CHIP

CT %3: ************4009 EXP: XX/XX

CARD: AMERICAN EXPRESS A Checkno: 5269 TableNo: 51/1

APPROVAL CODE: 801724 EMV Receipt Section

Application Label: AMERICAN EXER

TC: 0F65FE250EFD9B4F TVR: 0000008000 AID: A000000025010801

Subtotal: \$23.82

Tip:

Total: 27.8

Signature CUSTOMER COPY

TX Growth; Strategy Meeting See Lit of attended

Attachment OPUC 1-9.2 Page 41 of 452

Editle Vs Prime Seafcock

301 East 5th Street Austin, TX 78701

Check # (51945-850) Event ID: OCVOSKOO

Table 200	EAGUIT IN:	OCANOVO
Adam fi 20:59:44 12/09/2019		Get 20
1 Oban		22.00
1 The Enjoymen CA Z	inf Glu	24.00
2 Bay I Hayden		32.00
4 Heinekon		26,00
'1 Titos		10.50
1 Pellegrino		7,00
শু Shellfish Towor		300,00
3 Calamari		54.00
4 Crab Cake		80,00
A Macallan 12 year		17.00
d Godiya Gaka	. S 1944	52.00
4 Bananas Foster Cal	(a	56.00
Add Bearnalse		43.00 4.00
7 Fuji Apple Salad		-24,00
A Scallops		152.00
Ahl Turas		39.00
Ani Tuna 3 8oz Filet		129,00
a red acremin		33.00
13 0 \$11.00 each		
2 Honig Cab 4 Cakebread Napa Cha 1 Cappucoino		206.00
A Cakebread Napa Cha	ard	408.00
🖔 1 Cappucolno		5,00
I COKB		3.75
ı Administrative Fee	s (2%)	52.73
2 Redfish with Crab		74.00
4 Caesar Salad		4800
1 Hong Kong Seabasa		48.00
4 Lobster Bisque Cur)	44.00
4 80z Filet		172.00
1 Hong Kong Seabass		144.00
3 Add Jonah Crab		24.00
3 0 \$8.00 each 1 Burrata & Baet Sa	t mad	13.00
4 BLT Wedge Salad	वर्ष	52.00
1 22oz Bone/In Kibo	/A	58.00
5 Crab Fried Rice	•	75.00
5 Truffic Mac		70,00
A Rriverale Sornite		65.00

Subtotal 2688/98 Sales Tax 160.34 MB Sales Tax 61.50

*Guest Selected 20% Gratuity 527.25 Please pay this amount al 3438.07 Total

(4009) Amex

3438.07

65,00

9,00

, : . .

Amount Due 0.00 Change 0.00

APlease feel free to adjust the gratuity amount,

Contracted

5 Brissels Sprouts

1 Crab Chowder Cup

1 Goat Cheese Salad

20,59:45 12/09/2019

See Heat It emp Eddie We Frime 301 East, 5th Street Austln, TX 78701

Check # :51945-8501 Event ID: OCVOSKOO Tabre 200:207-203-201

Adam U 08:59 PM 12/09/2019 Ost 20 Transaction #:1319113565

AID::A000000025010301 TC::02174ADB78D4A008. App.Name/Label: AMERICAN.EXPRESS Card Verification: Signature Tran DataSource: Chip

Auth Code . Card Númber < xxxxxxxxxxxx4009</p> 822524 Amex

Check Amount 2910.82

Section Selected 20% Gratuity

responsi

SubTatal

.3

3438, 07

*Gratulty Change+/-

Final Total

Candmember agrees to pay total in accordance with agreement governing suce of such card.

,t Please feel free to adjust the gratulty amount. 4 -14

Attachment OPUC 1-9.2 Page 62 of 452

The Ritz-Carlton Golf Resort Naples GUEST FOLIO PRESENTATION

SOUTHWEST WATER COMPANY SOUTHWEST WATER COMPANY

SOUTHWEST WATER COMPANY

†2535 Reed Road Sugar Land, TX-77478 Credit Çăid# XXXXXXXXXXXXX6146 Arrivol Gate 09/09/2019, Departure Date 09/28/2018

Goost# Goost#

Group # 7698478 Room # 8474

Date	'Dèzailption	'Roforence'	Charges,	Credits	'Balanco'
09/10/19.	Banquot Lundr Local	61419	486.85	*	,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,
09/10/19	Banquel Coffee Brusk Local	£1209.	9,46.06		
09/11/19	Audlo Visual Equipment	X0545786	1,230.50		
09/11/19	Banquet Coffee Break Local	61420	901.48		
09/12/19:	Tiburon Golf	X0989270 [§]	650.52		
08/10/19	View			675.00	
09/09/19	ADVDP-XFER			-675,00	
00/00/19	ADVDP-XÊÉR			675.00	
00/00/19	Visa		۴	4,007.00	
Q9/23/19	Visua			~555:29	

TOTAL GUEST FOLIO BALANCE

(0.00) wo



This signoment is yout only receipt. You have aground to pay in cash to by approved personal check or to authorize us to charge your gradit card for all amounts charged to you. The account allown in the credit card sol with above. If his credit card entry in the reference column above will be charged to the credit card sol with above. If his credit card entry in the region card company with will be the required to the credit card company charged to the credit card, you will card to the credit card account, you will cave up such account, you will cave up such account, you will cave up such account to the credit card and the release of the release of the credit days on any unpaid amount at the release of 1.5% per granit (ANNIM).

FATE 15%), or the maximum allowed by law, pits the reasonable coal of collection, including allower focs.

Signatu	Œ		



We are proud to feature a 100% smoke-free fleet!

PLENTAL AGREEMENT HUMBER: 232940578

RECEIPT

K

taur Information

Challante Homes Prajables Mumber Budget Customer Chaquet, Tundame Sigure Mallost of Psyrphen Frequent Travelet Mumber.

HIGHAID RICH YORE PASTBREAK ENROLLMENT BLDLOOM FASTBREAK YORA KYZEGO WWINDOODGOKTARDER

Your Vehicla Information

Valida Number:
Valida Group Rentag:
Valida Group Rentag:
Valida Group Chargest:
Valida Besingtone
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Didognater-fair
Odomator-fair
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\$400 Rending;

*02002261 Cool Com Internacion CRY TIDD MUSTANIA TEXT TOD MET? *0679 *197 *3 at 100 to 100.

Your Rental

l'Idayî Date/jînin: Pickup Locallor:

EXT 16.2018/23:16AM TOO DEDAR TIPRINGS ROALS DALLAS LOVE F8 LD ARPORT DALLAS TX7/5/25/US 213-353-4840

Holom Dale/Time: Holom Lecalem:

TOT 17, 2019 84 20PM 7020 CEDAT SPRINGS RON) 1841 AS LOVE FIELD AIRPORT DALLAS TR.7:225, US 214-323 4040

Additional teas may made if changes me made to very solver date, time andler location.

Your Volicie Gharges (MRK 26 HRS / MAX 51 WRS)

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Weekly: Monthly: 2100	204	Time wind Milesyn:	126,593

Your Optional Products/Services

Optional Services Totals

sin.

Your Taxable Fees 11 11% Conscission Ricovery Fast ACCUSTY CHARRIC 1 COMY WEI LUCENSF RECOURT 1 MOOT CHENCY (12 COVCHY FIX 6 JAIOT 11.33 100 100

MUS total-Chargas: TAX 10,000%

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Your Man-Taxable PrindurisiServices

FUEL PURCH OPT

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Your Total Charges puid:

Prepayment

Hot Charges Your Total Duel

Albak yan barrentka wilk Radjal. Faz all alber handia, okcasu-contaus at 1-450-523-0700, ar ywydaeddion.

Your vehicle was repled to you by WANI.

Your vehicle was whiched in by FELIGIA.

Attachment OPUC 1-9.2 Page 102 of 452

Structur Nashville Downtown 623 Union Street Nashville, TN 37219 United States Tel: 615 259 2000 Fax: 615-742-6056 NAWK Meeting



ROBERT MACLEAN . Page Number Invoice Nbr - .53366A: 1422238 14 BIGTRL Guest Numbér MISSOURI CITY, TX, 774596827 Folio IC Arrive Date 12-OCT-19 22:16 -United States Of America-NA1204-NATIONALASSOCIATION OF WAXIT Cicpart Date 16-OCT-19 11:50 No. Of Guest 7 Room Number 2021 Marriott Bonvoy-Number t 9128

Tax ID: 20-0461638

Tax ID:	20-0461638		
Sheraton Na:	shy BNAND OC	T-16-2019 12:20 TSCOT105	
Date	Reference	Description	ges/Credits (USD)
12-OCT-19	20608	Bar Ang Lounge	11.94 11
12-OCT-19	RT2021	Room Clarg - GipAssociation	224.00-
12-OCT-19-	H72021	State Tax'	20.72
12-OCT-19	RT2021	Оссирансу/Тоийът	19.44
17-0CT-19	RT2027	Tax Other	2.50
13-OCT-19	RT2021	Room Chrg - Grp - Association	274 <u>,</u> 00 <u>°</u>
13-OCT-19	RT2021	Staté Tax'	, 20,72 ·
13-OCT-19	RT2021	Occupancy/Tourism	13.44
13-OCT-19	RT2021	Tay Office	2.40
140CT-19	RT2021	Room Chig-Grp-Association	224,00
14-OCT-19	RT2021	State Tax	20.72
14-QCT-19	RT2021	Oceupáqcy/Tourism	13:44
14-OCT-19	JKT2021	Tax Other	2.50
14 OCT-19	RT2021	Foolily Fee	5.00
14-OCT-19	PÉTZ021	Terx	0.46
15°0CT*19	RT2021	Room Chrg - GRP - Corporate	. 224.00
15-OC1-19	R12023	State Tax,	20.72
15-OCT-19	RT 2021	Occupancy/Tourism	13.44
15-OC1-19	1117021	Tax Other	2.50
15-OCT-19-	AX:	American Express-4009	-1,060,04
	Tor Addroniza	ation Purposic Önly	

xxxxxx4009

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Date Time 12-OCT-19

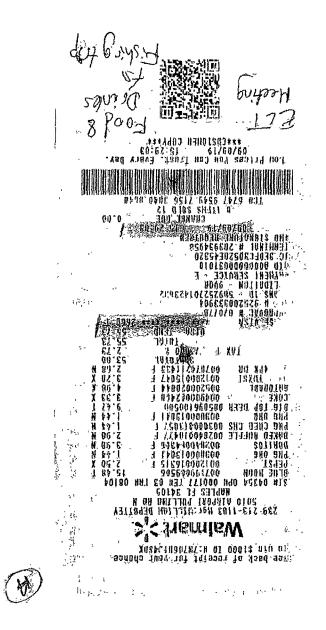
Code

Authorized

1048.10

Heal - \$ 11.94 Lodging - \$ 1048.

Continued on the next page



Attachment OPUC 1-9.2 Page 168 of 452



ELT Heating

USSNEMO (6366) 239.261.NEMO (6366) Cea Basa: Naples, FLUSA

MON SEPTEMBER 9,2019 CHECK #689833-1 TABLE #50

I FRÍED CALAMARI.		\$9.50
3 SEA BASS		\$113.85
1 TUNA ASIAN		\$29,95
GEKKE IKAN		\$6.99
CRUNCHY GROUPER	APP	\$9.95
SQUEALING PIG		\$42.00
*UB-TOTAL	:	\$212.20
XAN		\$14.86
TOTAL	ホ クク7	7.06

Gratuity Example: 18.00% 640.87 Gratuity Example: 20.00% \$45.41

Time: 19:26 4 CLISTOMERS.

Rob, Kirk, Rich, Keith

TRANSACTION RECORD.

USSNEMO 239.261.NEMO (6366) Sea Base: Weples, H. USA

31ASE \$227.06

TUTAL

272.06/

THANK YOU SEPTEMBER 5,2019 19:28:10 YOUR SERVER : JANIS

CUSTOMER: COPY

Attachment OPUC 1-9.2 Page 172 of 452



8 8 8 403 8 8 8 ***** CREDIT CARD YOUCHER ***** **冰**果果来***************************** RITZ CARLTON GOLF RESORT NAPLES, FL **** BELLA VISTA *** 14-Sep : 19-8:56: PM---

Check: CHK 3283 1/2/1 Table:

127969: Bay lea Server: Card Type: AMERICAN EXPRESS

Auth Code: 531979 Customer: ROBERT

MACLEAN

Amount:

\$371.29

GRATUITY \$

TOTAL 8

SIGNATURE_

please leave signed copy with your server

· ' & & & 403 & & & RITE CARLTON GOLF RESORT **** BELLA VISTA ****

127369 Baylee

CHK 3283

TBL 12/1 GST 4

MICHAELS 11 Sen 19:7-04 PM

11 260 18 1841	*/4
1 STELLA ARTOIS	9.00
2-SAINTSBURY PINOT NOIR	30.00
1 DIRTY DAVE'S	. 9 .00
1 BUFFLO TRACE	14,00
J. PRETZEL BITES	10.00
1 SPIÇY AVOCADO	12.00
1 SHISHITO PEPPERS	12.00
CRAGBY RANGE SAUV BLANC	28.00
SWANSON MERLOT	40.00
T MATAZANAS CHARD	18.00
1 SAINTSBURY PINOT NOIR	15.00
1-ADD SALMON	12.00
1 ADD: SNAPPER	14.00
1: OPEN BELLA FOOD	8.00
MASHED POTATO	
1 OPEN BELLA FOOD	0.00
MASHED POTATO	
1- OPEN BELLA FOOD	42,00
FILET MEDIUM MASHED POT	"5
TOPEN BELLA FOOD	42.00
FILET MEDIUM MASHED POTA	
1 OPEN BELLA FOOD	8.00
SAUTEED ASPARAGUS	``* **
1 OPEN BELLA FOOD'	`8.00
SAUTEED MIXED VERGIE	n nar
1 OPEN BELLA FOOD	8.001
SAUTEED BROCCOLI	
Subtotal:	8347.,DO
Tax:	\$24,29
:55 PM	¥#1 x #/

TOTAL DUE: \$371."

Attachment OPUC 1-9.2 Page 174 of 452

Pondicheri Bakê Lab + Shop 2800 Kirhy Dr., Suite B132 & R240 Houston, TX 77098 (713) 522-2022 eat@pondicher1.com

Örder# 1025094

Server: Robert M Table: Table 8

Date: 9/18/19, 7:03 PM

Glass Scarpetta Friuli P.Grigio D \$13.00 ICEU TEA DONN Chit Chaat \$9 Wine \$9,00 Samosa Non-Veg \$5.00 \$5.00 Samosa Non-Veg Grilled Kalonji Chops \$30,00 Roasted Saluon \$24.00 Butter Chicken [gf] \$24.00 Subtotal: \$113,00 Total Tax: \$9.32

\$122.32 Join:

Order Balance due:

\$122.32

Thank You! ORDER ONLINE pondicheri.com EAT WELL, LIVE SPICY Laurie Doubing, Nupa Bloven

ABE

Board Divisity Event PLANNING



GST 2

130

18,00

36.00

8,00

20.00

36,00

180.00

14,00.

14.00:

\$330,50 \$23.14



& & & 403. & & & X & X 403 & & & RITZ CARLTON GOLF RESURT ***** CREDIT CARD VOUCHER ***** **** BELLA VISTA **** ************* 127370 Matteo. RITZ CARLTON GOLF RESURT NAPLES, FL TBL 12/1 CHK 3175 **** BELLA VISTA #** 10-Sep* 19 0:40 P8 5006/SNAPPER PARTY 10 Sep 19 5:51 PM CHK 3175 - A Checks 12/1 Table: 1 SOFT DRINK 127370 Matteo Server: 2 DIRTY DAVE'S Gard Type: AMERICAN EXPRESS Z MATAZANAS CHARD TEST PAULI NA. Auth Code: 547627 1 BALVEN SGLB MAGLEAN. Customers ROBERT 2 MALT PINOT NOIR OPEN BELLA FÖÖD \$353.64 iount : SNAPPER FROM GUESTS I CRAGGY RANGE SAUY BLANC 1 CRAGGY RANGE SAUV BLANC GRATUITY \$ Subtotal: Tax: TOTAL \$ 8:36 PM TOTAL DUE: \$353.64 STGNATURE_ PLEASE COMPLETE FOR MOON CHARGES please leave signed copy GRATUITY___ with your server TOTAL Kenk, Libi, Row, Rob,

KeAL MARK. ELT Meeting

ROOM NUMBER

PRINT LAST NAME____

SIGNATURE____



& & & 403 & & &

****** CREDIT CARD YOUCHER *****

RITZ CARLTON GOLF RESORT

NAPLES, FL.

**** BELLA VISTA ***

11-Sep:19.8:56.PM-

Check: GMK 3283 Table: 12/1

Table: 12/1 Server: 127369 Baylee

Auth Code: 531979 Customer: ROBERT

MACLEAN

Amounts

\$371.29

GRATULTY 8 1.

TOTAL 8 495,2

SIGNATURE ...

please leave aluned copy with your server

Ent Nach

*** BELLA VISTA ***

127369 Baylee

CHK 3283 TBL 12/1 GST 4

MICHAELS 11 Sep'19 7:04 PM

1 401 \ E1 495)	
1 STELLA ARTOIS	9.00
2 SAINTSBURY PINOT NOIR	30,00
1 DIRTY DAVE'S	9.00
1.BUFFLO TRACE	14,00
T PRETZEL BITES	10.00
	12.00
1 SHISHITO PEPPERS	12.00
CRAGGY RANGE SAUV BLANC	28.00
"SNANSON MERLOT"	90100
T MATAZANAS, CHARD	18.00
1 SAINTSBURY PINOT NOIR	15:00
I ADO SALMON	12.00
1 ADD SNAPPER	14,00 14,00 8:00
, " Est Extend 1 OOD	8.00
MASHED POTATO	
	0.00
MASHED POTATO	. *
1 OPEN BELLA FOOD FILET MEDIUM MASHED POT TOPEN BELLA FOOD	42.00
FILET MEDIUM MASHED POY	~9 .
T OPEN BELLA FOOD	42,00
FILET MEDIUM MASHED PDIA	
1 OPEN BELLA FOOD	9.00
SAUTEED ASPARAGUS	5
1 OPEN BELLA FOOD	8.00
SAUTEED WIXED YERGIE	M 43
1 MPEN BELLA FOOD	8.00
SAÙTEED BROCCOLI	
Subtotal;	\$347,00
Tax;	\$24.29

*:55 PM
TOTAL DUE: 48371 L

Attachment OPUC 1-9.2 Page 186 of 452

Pondicheri Bake Lab + Shop 2800 Kirby Dr., Suite B132 & R240 Houston, TX 77098 (713) 522-2022 eat@pondicher1.com.

> Order# 1025094 Server: Robert M Table: Table 8

> > \$122.37

Date: 9/18/19, 7:03 PM

Glass Scarpetta Friuli P.Grigio ICED TEA Down Chit Chaat \$9 Wine	\$13.00 \$3.00 \$9.00
Samosa Non-Veg	\$5.00
Samosa Non-Veg	\$5.00
Grilled Kalonii Chops	\$30,00
Roasted Salmon	\$24.00
Butter Chicken [gf]	\$24.00
Subtotal: Total Tax:	\$113,00. \$9,32
TART	CC CC13
firmer	A IZO WIII

Order Balance due:

Thank You! ORDER ONLINE pundicheri.com EAT WELL, LIVE SPICY Laurie Dowling NUOC Paula Glover

ABE

Board Divisity Event PLANNing

Attachment OPUC 1-9.2 Page 190 of 452

SWUC PRIL DOIS OPERATIONS REVIEW DINNER. KIMACLEAN, KIMICHAEL, RIRICH. KIDIX, J. TIRKK, M. RODEICUEZ. IC. - ALLEY, CHEROL, C. PROFILE, C, SOREASEN, G. GOTT, J. FAMEY. E. THUSSIG, K. MORGEN ROTH T. STEVENS, RICHPOOL, M. MAFEEL. B. BEHIR. C. LEQUIN GTM P. GRANDICZ

> VETTLES oreal, must benifood 1550 Lake Pointe Parkway Sugar Land, Texas 77478 281-491-2901 Veritas Ştaak and Saafood: Cum

Server: Juan P 64/22/19 6:32 19

Miliain Fee

THE

Total

\$50,00

\$2:118 W

Table 44 Check #31 \$28.1111

4 Yallow-Rose IPA \$18 JU 2 Hakers Mark 34 w (11) ula Feshion. **集15**1200 4 miller Light . wwella Artois \$18.100 Til. Cab A. Strong Reserve:

\$20.00 \$9.00 tanun Royal " tapa Chica \$7,50 Tiges Parker Pinot 2174.00 z sakúbrásůď S 00.0112 \$489.65 y (4mb Prime Ribeye: MAY'K OF LAND (COPY) \$69,94 \$629″.!/· o Mnapper with Crab

38.74° Cortee \$1.657. 00 Subtotal \$330 01 20% aratusty (20:00%) US. 3618

Happy Hour Mon-Sat 4pm to 7111 Half aff featured Wings 490 to

7pm, Gift cards now available naline at

www.um.clossicationiseafood.com

,0,00001. 610040 .

ZW Leely

Verticas Steak and Semioud 1550 Lake Points Parkway Sugar Land: Taxas 77478 281-491-2901

Vuritas Steak and Seafoodcom

mrver: Juan P 09/22/19 6:32 PH THECK BOT Table 7)

Liedit Card Kayew u sė XXXXXXXXXTTAL. 1 ime 9:15 FM

Transaction Type Sala Auchortzation Approved Approvel Cade 056207 Payment TD TFNxMzxdYqdm

> Subtate1 \$1,651.90 20% gratuity (20:00%) \$330.38 \$136.30 TAX \$2 .118 . m = " Amount

* Additional Tip: = Total:

Suggested Additional Tip:

* 2%: (Tip \$33.04 Total \$2, 151.62) * 3%: (Tip \$49.56 Total \$2, 168.14)

* 5%: (Tip \$82,60 fotel \$2,201.18) # 7X: (Tip \$115.63 Total \$2,234,21)

Tip necentages are based on the check prime before taxes.

Customer Eppy

Nanc've sernéd 1651 points for This purchase. Redeem them to atuning up for our reverde Frairem.

Email Address

Humpy Hour Won-Set 4pm to /pm. Half off featured wines 4pm to Zpm.

Wift cards now overlable online at WWW.Defitassieakandseafood.com 9/3/2019

Transaction details - chase.com

Attachment OPUC 1-9.2 Page 233 of 452

PRIVATE CLIENT CHASE

CREDIT CARD (...2660)

San Jose, CA. Office/Bulnius Meeting

\$257.70

Aug 30, 2019 Transaction date United Airlines. (800) 932-2732 9/25-9/21

Sep 1, 2019 Posted date

Description UNITED 0362470277356

Also known as United Airlines

Method Online, mail or phone

Card number (...2660) Category Travel

Reference number 24510729243100894138231

Rewards éarned with this transaction

· Addl .5 mile per \$1 earned on United this

128.85

+ Addl ,5 mile per \$1 earned on all purchases

128.85.

*í míle per \$1 spent on alí purchases.

257,70

Total MileagePlus® Miles

515,40

Transaction defails may be preliminary or incomplete and may not match the transaction as it appears on your periodic statement, which is the official record of your account activity.

JPMorgan Chase Bank, N.A. Weimber (DIC

©2019 JEMorgán Cháse & Có.

Equal Opportunity Lender

- Original Flight - \$372.60 - Economy Seat. \$ 99.00 471.40 expense logal 7/29/19 - Concelled Flight of used for other trip.

- Hou- San José Flight - + 630.30 9/25-9/26 Credit & 375.60 - 375.60 + 257.70

- Change Fee - 7. + 0 200,00 - Premium Coloin - 7 + 189.00 - Upgrade 6/25 - Premium Coloin - 7 + 252.00 - Premium Coloin - 77

Uparabl 9/25

Attachment OPUC 1-9.2 Page 234 of 452

Marleni Sigaran

From:

United Airlines, Inc. <unitedairlines@united.com>

Sent:

Thursday, September 26, 2019 12:35 PM

To:

Marléni Sigaran

Subject:

efficket Itinerary and Receipt for Confirmation DVJPM8

Receipt for confirmation number DVJPM8

Inited logo link to home page

Confirmation: DVJPM8

Issue Date: August 30, 2019

TRAVELER INFORMATION

Traveler

eTicket Number

Frequent FlyerNumber

Seats

MÀCLEAN/RÓBERTG

0162470277356

UA-XXXXX024 Premier Silver / *S

--/--/>-=

FLIGHT INFORMATION

Day, Date

Flight ClassDeparture City and Time

Arrival City and Time.

AircraftMeal

Wed, 25SEP19UA1957L

HOUSTON, TX

SAN JOSE, CA

(IAH -BUSH INTL) 10:00 AM (SJC) 12:01 PM

Thu 26SEP19 UA920 C

SANJOSE, CA (SJC) 4:06 PM

DENVER, CO (DEN) 7:38 PM A-320 Dinner

Thu, 26SEP19 UA2028U

DENVER, CO

HOUSTON, TX

Purchase A-319

(DEN) 8:41 PM

(IAH-BUSH INTL) 11:58 PM

FARE INFORMATION

Fare Breakdown Airfare:

Form of Payment:

VISA

551,63 Last Four Digits 2660

USD

Attachment OPUC 1-9.2 Page 235 of 452

U.S. Transportation Tax: 41.37 September 11th Security Fee: 11.2 U.S. Flight Segment Taxs 12.6 U.S. Passenger Facility Chargo: 13.5 Per Person Total: 630.30 USD 630.30 * 3 * 75 cTicket Total: USD The airfare you paid on this itinerary totals: 551.63 USD The taxes, fees, and surcharges paid total: 78.67 USD Fare Rules: Additional charges may apply for changes in addition to any fare niles listed. NONREF/OVALUAFTOPT/GHGFEB Cancel reservations before the scheduled departure time or TICKET HAS NO VALUE. Add Collect: An additional amount for the difference in fare was charged to VISA. VIXXXXXXXXXXXX2660 on Friday, August 30, 2019, \$257,70 USD per ticket for an additional total of \$257.70 USD was collected. Additional Wed., Sep. 25, 2019/Visā 2660 was charged 252 USD for the SST / EDD 01615372290660. 252:00 USD for: Premium Cabin Upgrade Charges: Fri., Aug. 30, 2019/Visa 2660 was charged 200 USD for the Merchandising/Reservations eS\$T/SST / EDD 01615317274342 200.00 UST) for: Change Fee Tue., Jun. 25, 2019/Visa 2660 was charged 189 USD for the Merchandising / EDD 01615161814213 - for activated 189.00 USD for: Premium Cabin Upgrade

eTicket itinerary and Receipt

Attachment OPUC 1-9.2 Page 249 of 452

Receipt for confirmation number ARSOKC







A STAR ALLIANDEMEMBER 4

Confirmation: AR3QKC

Issun Onter April 05, 2019 Traveler MACLEAN/ROBERTGMR

Ticket Number 0162446992307

freguent Flyer VÁXXXXXXXX Premier Silver / *S

Seats

FLIGHT INFORMATION

Pay, Date Flight Class Departure City and Time Fri, 14JUN19 UA0494 Z LOS ANGELES, CA. (LAX) S:45 PM

Applyal City and Time HOUSTON, TX (TAIL-BUSH IN)L) 11:05 PM

Aircraft Meal

PARE INFORMATION

Fare Breakdown Allfare: Ú.S. Transportation Tax: September 11th Security Fee: U.S. Flight Segment Tax: U.S. Passenger Facility Charge: Per Person Total: 203,72050 15.28 5.5 4.7 233,30050

Form of Payme Last Four Dinte 2

eTicket Total:

233,30050

Fare Rules:

Additional charges may apply for changes in addition to any fare rules listed.

NONREF/OVALUAF TOPT/CHGFEF

The airfare you paid on this itinerary totals: 203.72 USD The taxes, fees, and surcharges paid total: 29.58 USD

Cancel reservations before the scheduled departure time or TICKET HAS NO VALUE.

Additional

Fro. Apr. 5, 2019/Visa 2660 was charged 27 USD) for the / EDD 0162923855005Z 77.00 USD for: Economy Plus Seat

FH., May. 24, 7019/Vise 2660 was charged 189 USB for The / EDD 01615100917604 189,00-USD for Premium Cabin Upgrade

Baggage allowance and charges for this itinerary.

Baggage fees are per traveler

Origin and destination for charked baggage 6/14/2019 tos Angeles, CA (LAX) to Houston, TX (IAH -Bush INTL)

1st bag 2nd bag 0.00 0.00 USD USD

Max wt / dim per piece 70.005 (32.0kg) - 62.0in (157.0cm)

Raggage chask-in must need with United or United Express, and you must have valid MileagePlus Premier® Silver membership at time of check-in to qualify for waiver of service charges for up to three checked bags (within specified size and weight limits),

MileagePlus Accrual Details

MÀCLEAN/ROBÉRTGMR

6/14/2019

Date Flight From/To 2019-04-05102:31:55 0494 Economy Plus Sedf-LAX IAH 0494 Los Angeles, CA (LAX)-Houston, TX (IAH -Bush INTI)

Award Miles POM PQS PQD

2758 1,5 204 342B Award Miles PQM POSPQD

Nebertgrin's MileagePlus Accrual totals:

Important Information about MileagePlus Earning

- · Accruals vary based on the terms and conditions of the traveler's frequent flyer program, the traveler's frequent flyer stutus and the Itinerary selected. United MileagePlus@ mileage accrual is subject to the rules of the MileagePlus program
- · Once travel has started, accruals will no longer display. You can view your MileagePlus account for posted accrual
- You can earn up to 75,000 award miles per ticket. The 75,000 award miles cap may be applied to your posted flight activity in an order different than shown
- POD are a Premier status requirement for members in the U.S. only.
- Accrual is only displayed for MileagePlus members wno choose to accrue to their MlieagePlus account.

eTicket Reminders

* Check-in Requirement - Bags must be checked and boarding passes obtained at least 30 minutes prior to scheduled departure. Baggage will not be accepted and advance seat assignments may be cancelled if this condition is not met.



BOD Heating

Chicas Names

Richard, Rich

Soulli West Water Company

Room #: 228

Group #: 16312

Guests:

1

11/14/2019

R12F96B - 1

29°1.45

Clerk:

11/11/2019-228L

CT, #

Arrive: 1	71.1719. Tim	C 22:13	Depart: 11/14/19	Time 03:02:55/	Stalus: TOIL	Page No. 1
Dine	Reference-	Description	ı -Comn	tour	Charger	Credita
11/11/2019	~228	ROOM CHAP	KGH		\$205.00%	
11/11/2015	2281	ROOMTAX	ROOM	M TAX	334.43	
11/11/2019	. 3362	HONOR BAR	FOOD —— Popia	ıriı 🐃	\$10.90 ·	
11/11/2015	-3364	HONOR BAR	FOOD Chooc	late Almonds	. \$10,90	. \ =
11/12/2015	228	ROOM CHAR			\$265,00°	<i>i</i>)
11/12/2019	2281	ROOM TÁX.	ROOM	a taż	534.45	.)
11/12/2019	246	HONOR BAR	FOOD Caslie	ivs ==	3 10.00	E.
11/13/2015	· 228	KOOM CHAR		16	52 65.00 ~	~{

ROOMTAX

Food - 932,70_J Lodging - + 898.35-H

ROOM TAX.

\$931,05 Polio Balunce:

\$34,45_ -

Attachment OPUC 1-9.2 Page 288 of 452

Operations Dincer

16

2pgs

Fernandos Latin Cuisine 281–494–9087

450

WEG OCTOBER 23,2019 CHECK #165002-1 THIS IS NOT AN INVOICE

TABLE #202

\$18.25 5 Coffee 1 Coke \$3.49 5 House Wine \$44.75 \$6.95 1 Corona 3 CUZQUENA \$20.85 2 Call Drink \$21.90 3 Premium \$38.85 4 Super Primium \$59.80 3 Michelob Ultra \$17.85 5 CALL WINE \$49.75 3 Super primium \$50.85 Main course 20 Open Food \$899.00 SÚB-TOTAL \$1230.29 SERVICE \$246.06 tax \$96.10 \$25.70 liquor tax TOTAL \$1598.15

Fernando's Latin Cufsine 14]35 SW FRWY Sugarland, TX, 77478 281-494-9087 Time: 19:07 20 CUSTOMERS

Ask your server how you can gave 20 % next visit 1 Gracies

> YOU HAVE BEEN SERVED BY : FERNAND

FERNANDOS
14135 SOUTHWEST FREEWAY
SUGAR LAND, TX 77478
281-494-9097

Names: Sie attached 431

SALE

Server #: 000002

/ AMOUNT

\$1,598.15

TIP \$__/0

TOTAL 1 \$ \$698 15 /

APPROVED

CHASE VISA.

AID: A0000000031010

TVR: 00 80 00 80 00

TSK E8 00

THANK YOU

CUSTOIER COST

Bris Meeting Dimer

JAPANETRO S 2168 Texas Drive (281)242-1121

. 3:48:57 FM

Jotal

8/19/2019

Status: Approved
Card Type: Visa / Swipe
Card Number: XXXXXXXXXXXX2660
Card Owner: MACLEAN/ROBERT
Server ID/Name: 738 / John
Check Number: 142073/1
Tab Number: 151 / Cansult 125.85
Tip 20

Approval: 071340

1 AGREE TO COMPLY WITH THE CARDHOLDER AGREEMENT

JAPANETRO S 2168 Texas Drive (281)242-1121

eck Ko o 51	142079/1 Server	736	Gueste	. 2
		enderver meer	ng Mar Sair (Wie gez) (yan sauri tan a	2.25 100.00
j:	r-dik? boo	otal		102,25
9ak	e Hot LG			14.00
ß	eveitağe S	ub-To	ta'i`	14,00
S	ales Tax	jes T	ìX	116.25 8,44 1.16
	STANDARD STA	Club Soda Small Boat Food Sub-f Sake Hot LG Severage S SUB TOTAL Sales Tax	51 Server 736 Club Soda Small Boat Food Sub-fotal Sake Hot LG Reverage Sub-To	1 51 Server 736 Gueste Club Soda Small Boat Food Sub-Total Gake Hot LG Geverage Sub-Total

* JOINT

125.85

Thank You, John

1:33:24 PM

8/19/2019

Check us out on Facebook & Twitter for new Features and specials! HAPPY HOUR EVERY DAY 3-6PM!!

Thurk you for visiting Japaneiro's at Sugarland Town Square! Mark, Kille, Lee, Chris, Sob, Rob Werte, Monteri, Pan, Fischer, Mike

STEAKHOUSE & GRILLI ... HARR & WELL DONE &

Perry's Steakhouse & Grille 2115 Towne Square Place Sugar Land, TX 77479

t	
Server: Honeyboy	08/26/2019
Table 500/1	8:48 PM
Guests: 11	70014
Reprint #: 1	
ů 11 de	in ha
Macallan 12	16.00
Lagavulin 16 Year Old	25.00
Glass Perry's Cabernet (4 020.00) B0.00
Glass Perry's Pinot Noir	14.00
Heineken (2 @6.50)	13.00
Appetizer Trio (2 845,00)	90.00
Bottle Perry's Cabernet (2 @BO.0	0 160.00
Baked Potato	10.00
Whipped Potatoes (2 @11.00)	22.00
Creamed Spinach	12.00
Reasted Creamed Corn	11.00
Sleamed Broccoli	9.50
Brussels Sprouts	12.50
Caesar Salad (2 611.00)	22.00 '
Program's Famous Pork Chop (2 042. Filet Mignon, 60z (2 041.00)	00° 84.04 82.00
Field Green & Pear Salad (2 012.	00 24.56 51.66
Filet Perry, 8oz Filet Mignon, 8oz	-45 (d)
Half Lobster Addition	13.00
Wedge Salad	11.00
Filet Mignon, 8oz (2 845.00)	90,00
Coffee	4.25
Warm Spinach Salad	12.00
French Onion Soup	17,00
Prime Ribaye	51.00
Butcher's Chop Salad	12.00
Pan Seared Sea Bass	46.00
Lobster Bisque	15,00
Grilled Salmon Lemon Dill	38,00
Service Fee 3%	32.59
•	\$\\\\\\\\\\\\\\\\\\\\\\\\\\\\\\\\\\\\\
Subtotal	1,118.84
Sales Tax_	54.21
MB Sales Tax	25.41
Total	1,208.46
Grafifty, 20, 00%	_217_25
Gratuity 20.00%	1 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1
· o cu :	通过的图书 , , · · · · · · · · · · · · · · · · · ·

a zpgs

Attachment OPUC 1-9.2

Page 392 of 452

PINNER R. MACLEAN J. FARNEY

M. QUINH

R. RICH

J. PARK

K. FISCHER

416.3

C PROFILET

C. SORENSEN

C. GOT

PORTO LEGGERO Hudson Terrace Jersey Bity, NJ-D7302-(201)434 3200 Dining Rm Person:1

Chk No Tab Cov Server Tinks Date ďo 10. 0 8:17:00 PM 5/1 208242 4/2019

* ~ ^ ~ ~ ~ ~ ~	construction of many gradual contributions of contributions of the contribution of the	*
ð	fried Callamari	42,00
Ą	Stuffed Hushröoms	.00, 00
1	Gniochī Bolognaise	28,00
.3*	Caesar Salad	39,00
1	Insolata Traditional	12.00
1	Rigatoni Con Rapa Sal.	24.00
ŧ	Penne Al Arrabbiata	24,00
7	Salmone Pignoli	54.00.
h	Pesce Special	180,00
1	Lobster special	43.95
	SILRibs special	32.98
4	Dessert	38.00
	Food Sub-Total	675,200
x	ESC Jamenes	238.00
4 2 7 1	515 Zingari	
<u> </u>	Coffee	5.00
7	Cappuccino:	10.00
1	Orambule	9.0ŭ
		TT 40 X10 240
	Beverage Sub-Total	280,00

206242 20% Gratuity 167.18 SUB TOTAL 1003.080 SALES TAX 55,37

> TOTAL 1058.45

> > Thank-You For Dining with Us. AT Porto Leggero

PORTO LEGGERO

ñate: 5/14/2019 Time: 8:33:26 PM.

Status:

Approved.

Card Type: Card Number: XXXXXXXXXXXX2660 -Expiration Date: Swipe/Harmai: Server ID:

Sorver Name: Jacon Check Number: 206242 Tab Number:

Profit Center ID: 9
fit Conter: Dining Am Profit Conter: Number Of Covers: 10 Persons:

Card Owood:

41 1

MACLEAN/ROBERT

AMOUNT 1058.45

!IP

Approval: 002560

I AGREE TO COMPLY WITH THE CARDILLEGER AGREEMENT

*

Customer Copy

Attachment OPUC 1-9.2 Page 393 of 452

13.10

عروق_{ا ال}الك

DINNER.

R. MACKEAN

K. FISCHER

********************** CHECK # 54875 DATE 5/19/19 TABLE # 203 TIME 9:42PM ****** ********* DUPLICATE CHECK The state of the s

1-TIEN : MEGAN

TIEMS ORDERED AMOUNT A MOAST CHICKEN: 24,00 1 SCALLOPS 29,00 4-LAPIROAIG 10Y 87.00

4. KROCKS>>

. . .

35

BUBTOTAL TOS JOU TAX 7.35

IDTAL DUE 112.35

OF GUESTS

Thank you for foining us at Fernyay Hotel Junedlin, FL 34698 (727)683-5999 www.femwavhotal.com

MJE 5/19/19 TIME -5:40:27PH ันเกิ 7233331 , ... es

> Femiliay Hotel 459 Edgewater Drive Dunedin, Fl 34598 727-683-5999

PLEASE LEAVE STONED COPY WITH SERVER

Amex AUTH 517258 TRL 203 CHECK 54825 IMF-AUTH 1-11CW HEGAN

AMOUNT 105,00 XAT 7.35

SUBTOTAL \$ 112.35 TIP &....

FOTAL \$...

CUSTOMER COPY

Attachment OPUC 1-9.2



* 1

P Directors Mu

Mr Richard Rìch 735 Parkbrook Ln Glendora CA 9174 United States		Room Ño⊱ Arñvål Ďeparture Page Ño⊱	***	0406. 08-06-19: 08-08-19: 1 of 2
INFORMÁŢIÓN ÌŅ	/OICE	Folió Ño. Conf. No. Cashier No.	*	14060450(**
Group	: Southwest Water Company	User ID:	> «	AORRIS,

Company Name : Southwest Water Company "084"

*08-08-19

Date	Description	Charges Credits
08-06-19	Parking Valet	35.00 PE
	ή ,	
08-06-19,	Package Rate	279.00
08-06-19	Room Tax	27.90°
08-06-19	Newport Beach City Assesment	8.97
08-06-19	CTA Fee	0.70
08-06-19	Destination Fee	10.000
08-06-19	Destination Fee - Room Tax	1.0 Ů
08-06-19	Destination Fee - Newport Beach City Assessment	0.30
08-06-1ଞ୍ଚି	Destination Fee - CTA Fee	0.00 G. 50.02 F/B (lease in leave that went H (6.31 F We) 100 leave that went
08-07-19	Příváte Dining Breakfast Food	1 50.02 FB Week Lat
	Room# 0406 : CHECK# 1046043	- Carl with
08-07-19	MarketPlace Sales Tax	0.33
	Room# 0406? CHECK# 1098973 -	"HI INEY
08-07-19	Aqua Lounge Lunch Soda	6.31 F
00.00.40	Room# 0406 : CHECK# 1020366 ~	569.26 E/D: Acujul 1/
08-0 7- 19	Oak Grill Dinner Liquor	209.20 v 1 2. Zecili.
ŏ8-07-19	Room# 0406 : CHECK# 1016676 - Package Rate	279.00
08-07-19	Room Tax	27.90
08-07-19	Newport Beach City Assesment	8.37
08-07-19 08-07-19	CTA Fee	0.70
		10.00
08-07-19	Destination Fee	10.00

690 Newport Center Drive Newport Beach, California 92660; U.S.A. 949,759.0808 * Fax: 949.759.0568 * FashionIslandHotel,com

Attachment OPUC 1-9.2 Page 414 of 452

La Tela Pizzeria 133 Village Green Lane Johns Island, SC 29455

Thank You for Visiting

ph 843-768-1951

TABLE: MAIN SEC 4-1 - 13 Gues & Your Server was Daniel O 11/17/2019 7:09:04 PM Sequence #: 0000023

fit #: 0437614



OTY PRICE 18.3 (20\$17,00) Pastl \$34.00 Kar cermut Squash Salad \$11.00 TALBAR BALAD \$9.00 moken Confit \$26,00 THE CKEN PARM Dinner \$25,00 .CLASSICO BIG popgio ac \$13.00 CLASSICO BTL poppio sc (36550.00) \$150,00 COAST HOPART (26\$7.00) \$14.00 Creativo 14" Pizza \$21.25 Blet Coke \$3,00 (38\$11.00) My Roasted Beets \$33.00 Titled Calamari LARGE (30\$15.00) \$45.00 HOLY CITY PLUFF HUD \$7.00 . Day 11de SunPeél Lager £8.00 . MANTCOTTT-DINNER \$24,00 . Hoatball Grinder (Subs (20\$1).00) \$22.00 (20\$4.00) Meatballs - 1 雅.00 Mixed Greens Salad ¥10.00 Quail egg pizza \$15,00 Rovioli \$20,00 Warm Bean Salad \$11,00 Subtotal \$511.25 Total Taxes \$64.53 Automatic Gratuity \$102.25

Grand total \$678.03

.Credit Purchase Raigs*

:MACLEAN/ROBERT

of type Ci. lan Writerance. Approval.

WEST OF

Corver

:VISA EXXXX XXXX XXXX 0535 :931638086860

:05766D :Daniel G :MATH SEC 4 1 Diriet Name

Payment Amount: \$578,03 includes \$102.25 from 20% Automatic Gratulty)

Additional Tip:

Total:

I agree to pay the amount shown above.

Please Come Back!

La: Tela Pizzeria 133 VIJ lage Green Lane Johns-Island, 80 29455 ph 843-768-1951

> Guest Check Thank You for Visiting

TABLE: MAIN SEC 41 - 13 Guests Your Server was Daniel G 11/12/2019 7:08:23 PM Sequence #: 0000023 ID #: 0432614

TEM	QTY	PRICE	ź
Basi1	(20\$17.00)	£34.00	
Butternut Squash Salad		\$11:00	
CAESAR SALAD	1	\$9.00	
Chicken Confit	1	\$26.00	
CHICKEN PARM Dinner	Ĩ	\$25,00	
CLASSICO BIG paggio se	.1	00.ELB	
CLASSICO BTL pogglu so	(30\$50.00)	\$150,00	
COAST HOPART	$(28 \pi 7.00)$	\$14.00	
Creativo 14" Pizza	1	\$21.25	
:Djet Coke	(1	00.E\$	
Ory Roasted Boets	(30,17700)	737.00	
fried Calamari LARGE	(30\$15.00)	\$45.00	
HOLY CITY PLUFF MUD	l	\$7.00	
Low Tide SunPeel Lager	,1	\$₿.00	
MANICOTTI-DINNER	1	\$21.00	
Meatball Grinder (Subs		\$22.00	
Heatballa - I	(2024.00)	\$8.00	
Wixed Greens Salad	{	QQ. QT\$	
Avati egg pizza	•	\$16.00	
Ravioli	1	\$20.00	
Warm Bean Salad	1	\$11.00	
7-70,070			

Subtăta1 \$511.25 Total Taxes 364.59 Automatic Gratuity **\$**578:03 Grand lotal

Please Come Back!

Guest Check

. \$5,000 manananana

225