

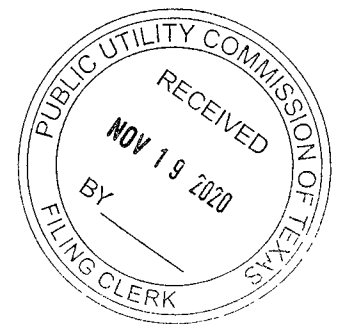


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SOAH DOCKET NO. 473-20-4709.WS
PUC DOCKET NO. 50944

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

**OFFICE OF PUBLIC UTILITY COUNSEL’S RESPONSE TO
MONARCH UTILITIES I L.P.’S FIRST REQUEST FOR INFORMATION**

The Office of Public Utility Counsel (“OPUC”) submits this response to Monarch Utilities I L.P.’s (“Monarch”) First Request for Information that was received on November 4, 2020. Pursuant to State Office of Administrative Hearings Order No. 2, OPUC’s response is timely filed within 10 business days of receipt of Monarch’s discovery request. OPUC stipulates that all parties may treat this response as if it were filed under oath.

Dated: November 19, 2020

Respectfully submitted,

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MONARCH 1-1:

Reference page 51 of the direct testimony of Chris Ekrut. Please provide any studies, analyses, or other justification to support your position the 50% reduction in O&M expenses that would likely occur if the maintenance of commercial or multi-family lift stations would be the responsibility of the customer instead of Monarch.

RESPONSE:

The 50% reduction in O&M expenses recommended by Mr. Ekrut is an assumption based on the fact that the Company cannot quantify the level of expense associated with activities that will now be the ratepayer's responsibility.

Prepared by: Chris Ekrut

Sponsored by: Chris Ekrut

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MONARCH 1-2:

Please refer to the list of entities Chris Ekrut has provided Cost of Service and Rate Design Studies for (Attachment CDE-A page 2 of 6).

- a. How many of these entities have separate Purchased Water or Purchased Wastewater clauses in their customer bills, rate schedules, or tariffs?
- b. How many of these entities has Chris Ekrut recommended that they implement a separate clause or billing charge for Purchased Water or Purchased Wastewater?

RESPONSE:

- a. To the best of Mr. Ekrut's knowledge, the only entities listed which currently have a separate Purchased Water or Purchased Wastewater clause within its customer bill, rate schedule, or tariff include Double Diamond Utilities Co., MSEC, and Quadvest.
- b. The only listed entity for which Mr. Ekrut recommended the implementation of a separate clause of billing charge for Purchased Water was the City of Murphy, Texas based on the goals and objectives outlined by the City staff and City Council.

Specific to the City of Colleyville, Texas, Mr. Ekrut worked with the City to structure its volumetric charge to only recover the cost of purchased water and wastewater treatment cost, while all internal costs specific to City operations are recovered within the fixed, minimum charge.

Prepared by: Chris Ekrut

Sponsored by: Chris Ekrut

CERTIFICATE OF SERVICE

I hereby certify that a copy of the foregoing document was served on all parties of record in this proceeding on this 19th day of November 2020, by facsimile, electronic mail, and/or first class, U.S. Mail.

Jessie Lance

Jessie Lance