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SOAH DOCKET NO. 473-20-4709.WS
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APPLICATION OF MONARCH
UTILITIES I L.P. FOR AUTHORITY
TO CHANGE RATES

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PUBLIC UTILITY COMMISSION
OF TEXAS

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

To: Office of Public Utility Counsel (OPUC), by and through its attorney of record, Chris Ekoh, 1701 N. Congress Avenue, Suite 9-180 P.O. Box 12397, Austin, Texas 78711-2197.

Monarch Utilities I L.P. (Monarch) files its Amended Responses to Office of Public Utility Counsel's First Request for Information (RFI) to Monarch received on September 4, 2020. This response is therefore timely filed. Pursuant to 16 Tex. Admin. Code (TAC) § 22.144(c)(2)(F), Monarch agrees and stipulates that all parties may treat the responses as if the answers were filed under oath.

Respectfully submitted,

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/s/ William A. Faulk, III

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**ATTORNEYS FOR MONARCH UTILITIES I
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CERTIFICATE OF SERVICE

I hereby certify that notice of the filing of this document was provided to all parties of record via electronic mail on December 7, 2020, in accordance with the Order Suspending Rules, issued in Project No. 50664.

/s/ William A. Faulk, III

WILLIAM A. FAULK, III

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MONARCH'S AMENDED RESPONSE TO
OPUC'S FIRST RFI

OPUC 1-4 Please reference the Direct Testimony of Jeffrey L. McIntyre at 24:9 11. Please provide all documentation, workpapers, and any analysis performed or prepared by Monarch supporting the statement, "Since the last test year, operating expenses have increased by a compound annual growth rate in line with the consumer price index."

AMENDED RESPONSE:

While reviewing the RFIs and responses, I noticed the response should have "the compound annual rate is a negative (-) 0.5 percent," instead of negative (-) 5 percent. The amended response is below:

As shown on Attachment OPUC 1-4, Monarch's operating expenses increased by a compound annual rate of 1.6 percent, excluding the effects of normalizing and known & measurable adjustments. This rate is in line with the Consumer Price Index for South Urban BLS, which was 1.4 percent. However, when expressed on an operating-expense-per-meter-equivalent basis, the compound annual rate is a negative (-) **0.5** percent, indicating that Monarch has actually decreased its operating expense per connection since its last general rate case.

Prepared by: Edward Taussig, Monarch Utilities I L.P.
Sponsored by: Jeffrey McIntyre, Monarch Utilities I L.P.

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**MONARCH'S AMENDED 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 November 2020.

AMENDED RESPONSE:

See *Confidential* Attachment OPUC 1-21, being filed under seal. The Direct Testimony of Edward Taussig on page 5 indicates Texas Utilities reorganized on January 1st, 2019. As a result, employees shifted into the new cost centers to begin the test year. In order to be consistent across the 3 years (2018-2020), the 2018 monthly worksheets in confidential attachment OPUC 1-21, have the actual (on board) employees in these new Monarch cost centers.

Additionally, Monarch identified and funded 18 positions in the 2018 and 2019 operating budgets required to increase business service levels supporting increased capital investment and previous customer growth in the 34 counties the company serves. This is consistent with the higher percentage of openings during 2018 and 2019 versus the current year.

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 the Position description in column (m) can vary over the 2018-2020 time frame.

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Sponsored by: Edward Taussig, Monarch Utilities I L.P.

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**MONARCH'S AMENDED RESPONSE TO
OPUC'S FIRST RFI**

OPUC 1-22 Please reference the Direct Testimony of Edward Taussig at 8:21. Please indicate the open positions, by title, that Monarch has yet to fill.

AMENDED RESPONSE:

See *Confidential* Response to OPUC RFI No. 1-22, being filed under seal.

Prepared by: Edward Taussig, Monarch Utilities I L.P.
Sponsored by: Edward Taussig, Monarch Utilities I L.P.