



## **Filing Receipt**

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**Item Number - 81**

**DOCKET NO. 54683**

**APPLICATION OF ENVIRO- § PUBLIC UTILITY COMMISSION  
MANAGEMENT FOR AUTHORITY §  
TO CHANGE RATES § OF TEXAS**

**COMMISSION STAFF'S SECOND REQUEST FOR INFORMATION TO  
ENVIRO-MANAGEMENT  
QUESTION NOS. STAFF 2-1 THROUGH STAFF 2-9**

Pursuant to 16 Texas Administrative Code (TAC) § 22.144 of the Commission's Procedural Rules, the Staff (Staff) of the Public Utility Commission of Texas (Commission) requests that Enviro-Management by and through its representative of record, provide the following information and answer the following questions under oath. The questions shall be answered in sufficient detail to fully present all of the relevant facts, within the time limit provided by the Presiding Officer or **by February 12, 2024**, if the Presiding Officer has not provided a time limit. Please copy the question immediately above the answer to each question. These questions are continuing in nature, and if there is a relevant change in circumstances, submit an amended answer, under oath, as a supplement to your original answer. State the name of the witness in this cause who will sponsor the answer to the question and can vouch for the truth of the answer.

Staff notes that despite the procedural schedule issued in SOAH Order No. 2, establishing January 8, 2024, as the deadline to issue discovery on Enviro-Management's Direct Testimony, Enviro-Management agreed to answer questions beyond this deadline pursuant to a Rule 11 Agreement. Furthermore, Staff notes that Enviro-Management filed supplemental information to its application on January 12, 2024.

Provide responses to the Requests for Information by filing with the Commission solely through the Interchange on the Commission's website and provide notice, by email, to all other parties that the pleading or document has been filed with the Commission, unless otherwise ordered by the presiding officer pursuant to the Second Order Suspending Rules in Project No. 50664.

Dated: January 22, 2024

Respectfully submitted,

**PUBLIC UTILITY COMMISSION OF TEXAS  
LEGAL DIVISION**

Marisa Lopez Wagley  
Division Director

/s/ Ian Groetsch  
Ian Groetsch  
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**CERTIFICATE OF SERVICE**

I certify that unless otherwise ordered by the presiding officer, notice of the filing of this document will be provided to all parties of record via electronic mail on January 22, 2024, in accordance with the Second Order Suspending Rules, filed in Project No. 50664.

/s/ Ian Groetsch  
Ian Groetsch

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QUESTION NOS. STAFF 2-1 THROUGH STAFF 2-9**

**DEFINITIONS**

- 1) "Enviro-Management" or "your" refers to that Enviro-Management and any person acting or purporting to act on their behalf, including without limitation, attorneys, agents, advisors, investigators, representatives, employees, or other persons.
  
- 2) "Document" includes any written, recorded, or graphic matter, however produced or reproduced, including but not limited to correspondence, telegrams, contracts, agreements, notes in any form, memoranda, diaries, voice recording tapes, microfilms, pictures, computer media, work papers, calendars, minutes of meetings or other writings or graphic matter, including copies containing marginal notes or variations of any of the foregoing, now or previously in your possession. In the event any documents requested by this Request for Information have been transferred beyond your control, describe the circumstances under which the document was destroyed or transferred and provide an exact citation to the subject document. In the event that documents containing the exact information do not exist, but documents do exist which contain portions of the required information, or which contain substantially similar information, then the definition of "documents" shall include the documents which do exist, and these documents will be provided.

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**INSTRUCTIONS**

- 1) Pursuant to 16 TAC § 22.144(c)(2), Staff requests that answers to the requests for information be made under oath.
- 2) Please copy the question immediately above the answer to each question. State the name of the witness in this cause who will sponsor the answer to the question and can vouch for the truth of the answer.
- 3) These questions are continuing in nature, and if there is a relevant change in circumstances, submit an amended answer, under oath, as a supplement to your original answer.
- 4) Words used in the plural shall also be taken to mean and include the singular. Words used in the singular shall also be taken to mean and include the plural.
- 5) The present tense shall be construed to include the past tense, and the past tense shall be construed to include the present tense.
- 6) If any document is withheld under any claim of privilege, please furnish a list identifying each document for which a privilege is claimed, together with the following information: date, sender, recipients or copies, subject matter of the document, and the basis upon which such privilege is claimed.
- 7) Pursuant to 16 TAC § 22.144(h)(4), if the response to any request is voluminous, please provide a detailed index of the voluminous material.
- 8) Staff requests that each item of information be made available as it is completed, rather than upon completion of all information requested.

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QUESTION NOS. STAFF 2-1 THROUGH STAFF 2-9**

Please respond to the following:

- STAFF 2-1** Please provide a copy of Enviro-Management's capitalization policy that was in effect during the test year. If no written capitalization policy exists, please explain the criteria used to determine when an expense is capitalized and included in rate base.
- STAFF 2-2** Does Enviro-Management have plant insurance? If so, please provide a copy of the policy.
- STAFF 2-3** Reference Schedule II-3 Operating Expenses of the application. Please provide itemized list for the Contract Work expense (\$-17,433).
- STAFF 2-4** Reference Schedule III-3 Plant in Service of the application. Please provide land acquired date and explain why land is not included in the Net Book Value total.
- STAFF 2-5** Reference Schedule III-3 Plant in Service of the application. Please provide invoices, receipts, or work orders to support the plant item costs or provide a statement indicating where this information is included.
- STAFF 2-6** Reference Schedule III-3 Large Items of the application. Please confirm or deny if the work performed for emergency main repairs and re-work electrical panel is a recurring expense. Please provide supporting historical documentation.
- STAFF 2-7** Please provide a copy of the bill of materials and labor costs that support the utility's tap fee.
- STAFF 2-8** Please provide any invoices, receipts, and workorders that support the utility's tap fee.
- STAFF 2-9** Please state if tap installations will be done by the utility's internal employees or by a contractor.