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Filing Date - 2024-01-25 01:17:49 PM

Control Number - 54683

Item Number - 82

SOAH DOCKET NO. 473-24-00831
DOCKET NO. 54683

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

COMMISSION STAFF'S THRID REQUEST FOR INFORMATION TO
ENVIRO-MANAGEMENT
QUESTION NOS. STAFF 3-1 THROUGH STAFF 3-5

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 14, 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 25, 2024

Respectfully submitted,

**PUBLIC UTILITY COMMISSION OF TEXAS
LEGAL DIVISION**

Marisa Lopez Wagley
Division Director

/s/ Ian Groetsch
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DOCKET NO. 54683**

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 25, 2024, in accordance with the Second Order Suspending Rules, filed in Project No. 50664.

/s/ Ian Groetsch
Ian Groetsch

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**COMMISSION STAFF'S THIRD REQUEST FOR INFORMATION TO
ENVIRO-MANAGEMENT
QUESTION NOS. STAFF 3-1 THROUGH STAFF 3-5**

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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ENVIRO-MANAGEMENT
QUESTION NOS. STAFF 3-1 THROUGH STAFF 3-5**

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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Please respond to the following:

Staff 3-1 Please identify your current connection count.

Employee Labor

Staff 3-2 Please provide the amount that Enviro-Management incurred for billing services during the test year and include supporting documentation showing how much it paid for the billing services. In your response, please provide 2023 W-2s or 1099s for any employee or contractor labor.

Office Services and Rentals

Staff 3-3 Refer to Enviro-Management's response to Staff RFI 1-3. Please provide documentation that supports the \$9,759 requested for office and rental services, including the square footage covered by Enviro-Management's office rental. Please provide a copy of the current office space lease agreement, if applicable.

Lone Star Groundwater Conservation District Pumpage Fee

Staff 3-4 Does Enviro-Management request recovery of any water pass-through charges? If so, please provide supporting documentation of costs and historical line losses.

Fixed and Variable Expenses

Staff 3-5 Please provide how costs were allocated between the fixed and variable expenses figure you provided in Schedule VI-1.