

BEFORE
THE PUBLIC SERVICE COMMISSION OF
SOUTH CAROLINA
DOCKET NO. 2016-29-WS

IN RE:)	
)	
Application of Harbor Island)	
Utilities, Inc. for adjustment of)	FIRST REQUEST FOR PRODUCTION OF
rates and charges for, and the)	INTERVENOR HARBOR ISLAND OWNERS
modification of certain terms and)	ASSOCIATION
conditions related to, the provision)	
of water and sewer service.)	

TO: J. THOMAS MIKELL, ESQ. AND MIKELL LAW FIRM, ATTORNEYS FOR HARBOR ISLAND UTILITIES, INC.

Harbor Island Owners Association (“HIOA”) hereby requires Harbor Island Utilities, Inc. (“HIU” or the “Applicant”) to answer this First Request for Production as soon as possible, but no later than twenty (20) days after service hereof, in accordance with Public Service Commission of South Carolina (“Commission”) Rule 103-833 (10 S.C. Code Ann. Regs. 103-833). In these Requests for Production, the terms “you” and “yours” are used to refer to Harbor Island Utilities, Inc. These Requests for Production shall be deemed to continue until the time of the hearing of the case.

DEFINITIONS

1. “Applicant” shall mean Harbor Island Utilities, Inc., with its managers, employees, agents, consultants, experts, parents, subsidiaries, affiliates, partner companies, and all other persons acting on behalf of Applicant.
2. “Document” and “Documentation” are used in their broadest sense and include graphic matter of any kind or nature, whether written, printed, typed, recorded, filmed, transcribed, or

produced by any means. “Document” and “Documentation” include, but are not limited to, records, emails, personal notes, studies, calendars, diaries, appointment books, agendas, minutes, telephone messages, graphs, records of meetings, summaries or records of telephone conversations, summaries or records of meetings or conferences, tabulations, analyses, evaluations, projections, work papers, statements, billing records, journals, and invoices. The terms “Document” and “Documentation” also include every other means by which information is stored, recorded or transmitted, including, but not limited to, computer files, photographs, videotapes, tape recordings, microfilms, computer programs, punch cards, printouts, recordings made through data processing techniques, and the written information necessary to understand and use such materials. “Document” and “Documentation” are further defined to mean the original, any drafts, and any non-identical copies (i.e., those bearing notations or marks not found on the original).

3. “Identify” used with reference to an individual means to state his or her full name, present or last known address, and present or last known employment.

4. “Identify” used with reference to a writing means to state the date, author, type of document (e.g., letter, memorandum, telegram, chart, etc.) or other means of identification, and its present location or custodian. If any such document is no longer in HIU’s possession or subject to its control, state its disposition.

5. “You” and “Yours” include Harbor Island Utilities, Inc. and any of its members, individually, who have knowledge or control of information requested.

REQUEST FOR PRODUCTION

1. Copies of any discovery requests or other requests for information or documents HIU has received from any party to this Proceeding, including without limitation the Office of Regulatory Staff, and any responses provided by HIU.
2. Copies of all documents, including promissory notes, related or referring to loans from R. Arnold Ellison, Jr., Catherine C. Gross, Palmetto State Bank and other creditors, if any.
3. Copies of current and immediately previous O&M contracts.
4. Copies of all documents used or relied upon to calculate the “reasonable operating margin” referenced in pages 5, 10 and 22 of your Rate Adjustment Application.
5. Copies of all contracts between you and consultants, contractors, or other third parties for administration, management and/or maintenance services.
6. Copies of all documents used or relied upon to determine or estimate the amount of State and Federal Taxes as referenced in Table 3-1 on page 31 of your Rate Adjustment Application.
7. Copies of all depreciation schedules or studies.
8. Copies of 2014 and 2015 State and Federal tax returns.

[Signature page follows.]

LAUGHLIN & BOWEN, P.C.

By: s/Drew A. Laughlin
Drew A. Laughlin
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Attorneys for Harbor Island Owners Association

November 9, 2016
Hilton Head Island, South Carolina

BEFORE
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CERTIFICATE OF SERVICE

This is to certify that I, Drew A. Laughlin, have this day served a true and correct copy of the within First Request for Production of Intervenor Harbor Island Owners Association upon all parties of record by depositing same in the United States Mail with sufficient postage thereon to assure delivery as follows, to-wit:

J. Thomas Mikell, Esq.
Mikell Law Firm
P.O. Box 1727
Beaufort, SC 29901-1727

Shannon Bowyer Hudson, Esq.
Office of Regulatory Staff
1401 Main Street, Suite 900
Columbia, SC 29201

Jenny R. Pittman, Esq.
Office of Regulatory Staff
1401 Main Street, Suite 900
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Robert G. Gross, President
Harbor Island Utilities, Inc.
P.O. Box 1028
Beaufort, SC 29901-1028

This 9th day of November, 2016.

LAUGHLIN & BOWEN, P.C.

By: s/Drew A. Laughlin
Drew A. Laughlin
P.O. Drawer 21119
Hilton Head Island, SC 29925

