

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 INTERROGATORIES OF
rates and charges for, and the)	INTERVENOR HARBOR ISLAND
modification of certain terms and)	OWNERS 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 these First Interrogatories 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 Interrogatories, the terms “you” and “yours” are used to refer to Harbor Island Utilities, Inc. These Interrogatories 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.

INTERROGATORIES

1. Describe the rate setting methodology and information used to calculate the adjustments to rates and charges requested in your Application.

2. Define the “reasonable operating margin” referred to in pages 5, 10 and 22 of your Rate Adjustment Application. Describe the method and information used to calculate or determine said “reasonable operating margin”.
3. Identify all current contracts and service agreements to provide administration, management, engineering, and/or maintenance services to HIU.
4. Identify your accountant.
5. What State and Federal tax obligations are referenced in Table 3-1 of your Rate Adjustment Application? Are you expecting an increase in your State and Federal tax liabilities as compared to the year ended December 31, 2015? If so, state the amounts and causes of the expected increases.
6. Identify the cost components covered by your current and proposed water Base Rates.
7. Identify the cost components covered by your current and proposed water Commodity Rates.
8. State the total volume of water HIU purchased during each of the past two years.
9. State the total volume of water HIU sold to customers during each of the past two years.
10. Identify all depreciable assets of HIU and all depreciation studies or schedules related or referring to said assets.

[Signature page follows.]

Respectfully submitted,

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

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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 Interrogatories 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
Columbia, SC 29201

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

