

BEFORE THE PUBLIC SERVICE COMMISSION
OF THE STATE OF MISSOURI

FILED
December 8, 2017
Data Center
Missouri Public
Service Commission

In the Matter of the Rate Increase Request)
Of Indian Hills Utility Operating Company, Inc.)

Case No. WR-2017-0259

PUBLIC COUNSEL FOURTH SET OF DATA REQUESTS
TO INDIAN HILLS

The Office of Public Counsel (Public Counsel or "OPC") hereby provides the following Data Requests to Indian Hills Utility Operating Company, Inc. ("Indian Hills" or "the Company") pursuant to the Commission's Rule 4 CSR 240-2.090. Please provide electronic responses to the following: opcservice@ded.mo.gov.

Contact Information: The term "Contact Information" shall include names, phone numbers, last known addresses, and last known e-mail addresses.

Documents: The term "document" or "documents" shall include any originals and/or copies of any written, printed, typed, electronically stored, and/or graphic matter of any kind or nature, however produced or reproduced, now in your possession, custody or control, or in the possession, custody or control of your agents, representatives, employees of you or any and all persons acting in your behalf, including documents at any time in the possession, custody or control of such individuals or entities, or known by you to exist.

Privileged Information: These requests may include requests for documents or information for which the recipient believes there may be a claim of privilege. Any such privileged information or documents shall be withheld from disclosure provided that the proponent produces an index of these documents and this information in the form of a Privilege

Exhibit No. 239
Date 11-28-2017 Reporter Stewart
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Log. Such Privilege Log shall include the nature of the privileged documents, the legal basis for the claim of privilege, names and Contact Information for the authors and the recipients of any documents for which the proponent claims privilege, and the number of documents that are subject to the claim of privilege.

Supplemental Replies: Please provide supplemental information to any of Indian Hills' replies in a timely manner if Indian Hills learns that a disclosure or response is incomplete or incorrect.

This case: the term "this case" means WR-2017-0259

You: The term "you" and "your" means Indian Hills as previously defined.

DATA REQUEST

35. In response to Staff DR 47, Indian Hills provided an "adverse action notice" dated May 26, 2017 from Bloomsdale Bank. The rejection letter states that a loan was not granted for the following reasons: income insufficient for amount of credit requested, value or type of collateral insufficient, and company owners unwilling to personally guarantee loan.

For every company and/or natural person contacted by Indian Hills to obtain debt financing, please explain the receptivity and posture of Indian Hills' ownership about guaranteeing loans.

Please include a separate response for each entity/natural person contacted if the answer is different for the entities/natural persons contacted.

36. When Indian Hills interacted with lenders/financiers, did any other company or natural person convey their willingness to guarantee the loans? If yes, then please provide the name of the lender/financier, any Documents evidencing how the guarantee was conveyed (e.g., if included in loan application), and the name and contact information of the company or natural person.

Please include a separate response for each entity/natural person contacted if the answer is different for the entities/natural persons contacted.

37. When Indian Hills approached lenders/financiers, what limits and what amount of money was Indian Hills authorized to contribute to help finance the Project Costs as defined in the Indian Hills Construction Loan and Security Agreement at Page 7?

Please include a separate response for each entity/natural person contacted if the answer is different for the entities/natural persons contacted.

38. Indian Hills responded to OPC DR 18 by stating that, "Josiah Cox is the only person that has made transactions from [various affiliate entities'] accounts."

Did Mr. Cox, through First Round, have the authority to give Indian Hills additional cash in exchange for equity? If so, please explain why additional cash was not provided to Indian Hills to improve its financial health during the time Indian Hills was looking for a loan/financing.

39. Please explain how Indian Hills conveyed its plan to make loan payments to potential lenders in the interim- and until rates would become effective. For example, if the parent could have supplied equity to meet debt obligations in the short-run, please include the information conveyed and an explanation of the plan. Please include a separate response for each entity/natural person contacted if the answer is different for the entities/natural persons contacted.

40. Please produce an updated water loss report from the April 2016 to September and/or October 2017.

41. Please produce the operating agreements for all PSC regulated subsidiaries of First Round.

42. -Please produce a redlined copy of the tariff that Indian Hills plans to file in this case.

43. Please provide an updated accounting of rate case expenditures including actual costs and anticipated costs.

Issued by Ryan Smith, Keri Roth, John Robinett, and Greg Meyer on 10/17/2017