DR 0133 Response

- 133. Daronn Williams's direct testimony in WR-2023-0344 states that "new company trucks were purchased in February 2023". Please provide all data and information the Company provided Staff regarding the purchase of new company trucks, including but not limited to:
 - a) The timeline for purchasing new company trucks;

Staff does not know the exact date each vehicle was purchased. See below for the date the vehicles were added to the Company's general ledger. Mr. Williams mistakenly stated the vehicles were purchased in February 2023. Safety features were added to the trucks in February 2023. This will be corrected in his Rebuttal Testimony.

Date Added to Ledger	Vehicle Description	Purchase Price
7/1/2022	2022 RAV4 hybrid	\$ 47,309
7/1/2022	2022 RAM 2500 truck	\$ 57,789
7/1/2022	2022 RAV4 hybrid	\$ 49,974
8/1/2022	2022 RAM 2500 truck	\$ 59,851
8/1/2022	2022 RAM 2500 truck	\$ 59,835
8/1/2022	2022 RAM 1500 truck	\$ 63,564
12/1/2022	2022 RAM 3500 truck	\$ 94,640

b)

How many and what type(s) of trucks did the company plan on purchasing?

Per RWC's response to DR 14 of Case No. WF-2021-0427, they planned on purchasing the following nine vehicles:

Planned Vehicles to Purchase	Estimated Cost
2021 TOYOTA RAV 4	\$ 31,679.00
2021 TOYOTA RAV 4	\$ 31,679.00
2021 RAM 2500	\$ 50,590.00
2021 RAM 2500	\$ 52,890.00
2021 RAM 2500	\$ 49,290.00
2021 RAM 2500	\$ 62,470.00
2021 RAM PROMASTER 1500 VAN	\$ 44,730.00
2021 RAM 3500	\$ 43,145.00
2021 RAM 5500	\$ 52,765.00

c) The estimated cost of each truck and the total **planned** purchase amount;

See above for the price of each vehicle the Company planned on purchasing. The total planned amount was \$504,238. This includes \$85,000 for safety lights and other equipment for the vehicles. See Exhibit C from Case No. WF-2021-0427.

d) Any references to additional vehicles the Company intends to purchase that are otherwise not already included in page 5, line 3, of Mr. Williams's direct testimony.

No.