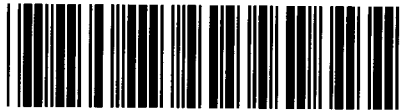




Control Number: 42854



Item Number: 107

Addendum StartPage: 0

**SOAH DOCKET NO. 473-14-5134
(SOAH DOCKET NO. 582-08-2284)
PUC DOCKET NO. 42854**

RECEIVED
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PUBLIC UTILITY COMMISSION
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DOUBLE DIAMOND UTILITIES CO.	§	BEFORE THE STATE OFFICE
APPLICATION TO DECERTIFY A	§	
PORTION OF CERTIFICATE OF	§	OF
CONVENIENCE AND NECESSITY	§	
(CCN) NO. 12362 FROM NORTHWEST	§	ADMINISTRATIVE HEARINGS
GRAYSON COUNTY WCID 1 AND TO	§	
AMEND CCN NO. 12087, IN GRAYSON	§	
COUNTY, APPLICATION NO. 35903-C	§	

**COMMISSION STAFF'S FIRST REQUEST FOR INFORMATION
AND FIRST REQUEST FOR ADMISSIONS
TO DOUBLE DIAMOND UTILITIES (DDU)
QUESTION NOS. STAFF RFI 1-1 THROUGH STAFF RFI 1-22
AND STAFF RFA 1-1 THROUGH STAFF RFA 1-4**

Pursuant to § 22.144 of the Commission's Procedural Rules, the Staff of the Public Utility Commission of Texas (Staff) requests that Double Diamond Utilities Company (DDU) by and through its attorneys of record, provide responses to Staff's first request for information (RFI) and Staff's first request for admission (RFA) under oath. The question(s) shall be answered in sufficient detail to fully present all of the relevant facts, within the time limit provided by the P.U.C. Subst. R. 21.144 (20 calendar days). Please copy the question immediately above the answer to each question. These question(s) 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.

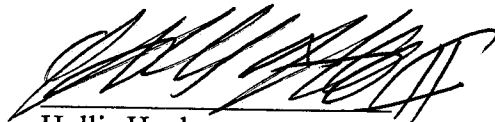
Provide an original and three copies of your answers to the questions to the Filing Clerk, Public Utility Commission of Texas, 1701 N. Congress Avenue, P.O. Box 13326, Austin, Texas 78711-3326.

Dated: October 17, 2014

Respectfully Submitted,

Joseph P. Younger
Division Director
Legal Division

Karen S. Hubbard
Managing Attorney
Legal Division



Hollis Henley
Attorney-Legal Division
State Bar No. 24066672
(512) 936-7230
(512) 936-7268 (facsimile)
Public Utility Commission of Texas
1701 N. Congress Avenue
P.O. Box 13326
Austin, Texas 78711-3326

CERTIFICATE OF SERVICE

I certify that a copy of this document will be served on all parties of record October 17, 2014, in accordance with P.U.C. Procedural Rule 22.74.



Hollis Henley

**SOAH DOCKET NO. 473-14-5134
(SOAH DOCKET NO. 582-08-2284)
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**COMMISSION STAFF'S FIRST REQUEST FOR INFORMATION
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TO DOUBLE DIAMOND UTILITIES (DDU)
QUESTION NOS. STAFF RFI 1-1 THROUGH STAFF RFI 1-22
AND STAFF RFA 1-1 THROUGH STAFF RFA 1-4**

DEFINITIONS

- A. **“DDU,” “Double Diamond,”** or **“you”** refers to Double Diamond Utilities Company and any person acting or purporting to act on their behalf, including without limitation, attorneys, agents, advisors, investigators, representatives, employees or other persons.
- B. **“WCID”** refers to the Northwest Grayson Water Control and Improvement District No. 1 and any person acting or purporting to act on their behalf, including without limitation, attorneys, agents, advisors, investigators, representatives, employees or other persons.
- C. **“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 the Company's 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 not exist and these documents will be provided.

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**COMMISSION STAFF'S FIRST REQUEST FOR INFORMATION
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TO DOUBLE DIAMOND UTILITIES (DDU)
QUESTION NOS. STAFF RFI 1-1 THROUGH STAFF RFI 1-22
AND STAFF RFA 1-1 THROUGH STAFF RFA 1-4**

INSTRUCTIONS

- 1) Pursuant to P.U.C. Proc. R. 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 P.U.C. Proc. R. 22.144(g)(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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QUESTION NOS. STAFF RFI 1-1 THROUGH STAFF RFI 1-22
AND STAFF RFA 1-1 THROUGH STAFF RFA 1-4**

- Staff 1-1 Please explain in detail how you can provide water service faster and/or cheaper in the requested area than other retail public utilities in the proximate area.
- Staff 1-2 Please explain in detail the estimated amount of time it would take you to provide water service to customers in the requested area located or proposed to be located furthest from your current facilities.
- Staff 1-3 If there are consumers already located in the requested area, please state whether those consumers are currently receiving water service and identify the service provider(s).
- Staff 1-4 Please explain in detail how you have the financial, managerial, and technical capability to provide continuous and adequate service to the requested area.
- Staff 1-5 Please describe the amount and type of all initial and long-term water facility costs that will be passed on to customers in the requested area.
- Staff 1-6 Please describe the probable improvement in water service or the lowering of costs to consumers in the requested area, if any, that granting your application will provide, including historical data concerning water quality and current and projected costs to consumers in the requested area.
- Staff 1-7 Please describe the water facilities currently in place that will serve the requested area, including a listing of the capacities of each component of the systems, i.e., wells (including capacity in gallons per day), storage tanks, pressure tanks, pumps, water lines (including size and quantity), and water treatment plants (including capacity in gallons per day and capacity not already used to meet peak demands for your existing customers and/or customers you are already committed to serve).
- Staff 1-8 Please indicate and describe the proximity of the requested area to any existing and/or proposed water facilities that you currently or will own and/or operate.
- Staff 1-9 Please describe the method for determining water rates for the requested area, including all costs of service (tap fee, base rate and gallonage, etc.) for an individual customer.

- Staff 1-10 Please submit your proposed and current rate schedule.
- Staff 1-11 Please describe in detail the need for water service in the requested area, including but not limited to written requests for service, presence of current customers, and developments plans.
- Staff 1-12 Please describe and discuss in detail any changes to the environmental integrity of the requested area that may occur if your requested water CCN amendment is granted.
- Staff 1-13 Please describe in detail any service agreements that you have with any other retail public utility to provide water service to the requested area.
- Staff 1-14 Please describe and discuss in detail any effect on the land in requested area if your requested water CCN amendment is granted.
- Staff 1-15 Please identify any and all violations of any Texas Commission on Environmental Quality (TCEQ) regulation committed or attributed to DDU during the past five (5) years concerning any areas for which DDU provides water service.
- Staff 1-16 Please identify any and all violation of any Environmental Protection Agency (EPA) regulation committed by or attributed to DDU during the past five (5) years concerning any areas for which DDU provides water service.
- Staff 1-17 Please provide documents that show there is a need for service in the requested area, including but not limited to written requests for service or subdivision plats and provide maps showing the location of the properties for which water service has been requested in the requested area.
- Staff 1-18 Please provide a map(s) of all your water facilities currently in place and located in or within two miles of the requested area.
- Staff 1-19 Please provide a customer complaint record showing all the water service complaints that you have received from your customers in the past year in Dallas County.
- Staff 1-20 Please provide an engineering report(s) indicating your existing water capacity, how much water capacity is needed to serve the requested area, how much water capacity you have in reserve, and how you will obtain the remaining water capacity needed to provide continuous and adequate water service in the requested area.
- Staff 1-21 Please provide the supporting documents for all the costs of service presented in your response to Staff 1-9.

Staff 1-22 Please provide any water and/or service agreements between you and any other retail public utility discussed in your response to Staff 1-13.

REQUESTS FOR ADMISSIONS

Staff 1-1 Admit or deny that DDU is currently providing retail water service to customers in the requested area.

Staff 1-2 Admit or deny that DDU has water facility lines and/or infrastructure currently available to provide retail water service in the requested area.

Staff 1-3 Admit or deny that the WCID has water facility lines and/or infrastructure currently available to provide retail water service in the requested area.

Staff 1-4 Admit or deny that the WCID has made an offer to provide retail water services to the area being sought by DDU in this application.