



Control Number: 42931



Item Number: 32

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DOCKET NO. 42931

RECEIVED

APPLICATION OF MANVILLE WATER §
SUPPLY CORPORATION AND §
LAKESIDE WATER CONTROL AND §
IMPROVEMENT DISTRICT 1 FOR §
APPROVAL OF A SERVICE §
AGREEMENT IN TRAVIS COUNTY §
(37792-C) §

PUBLIC UTILITY COMMISSION

OF TEXAS

2015 MAY -2 PM 3:24

PUBLIC UTILITY COMMISSION
FILING CLERK

**COMMISSION STAFF'S FIRST REQUEST FOR INFORMATION
TO MANVILLE WATER SUPPLY CORPORATION (MANVILLE WSC) AND
LAKESIDE WATER CONTROL IMPROVEMENT DISTRICT 1 (LAKESIDE WCID 1)
QUESTION NOS. STAFF 1-1 THROUGH STAFF 1-9**

Pursuant to 16 Tex. Admin. Code Ann. § 22.144 (TAC), the Staff of the Public Utility Commission of Texas (Staff) requests that the Manville Water Supply Corporation (Manville WSC) and Lakeside Water Control Improvement District 1 (Lakeside WCID 1) by and through its attorneys of record, provide the following information and answer the following question(s) 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 Presiding Officer or within 20 days, if the Presiding Officer has not provided a time limit. 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.

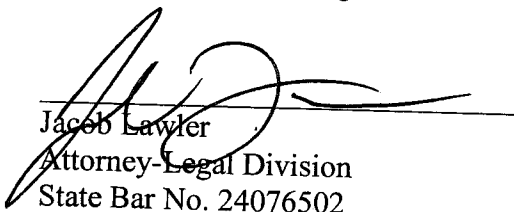
Provide an original and three copies of your answers to the questions to the Filing Clerk, Public Utility Commission of Texas, 1701 N. Congress Avenue, P.O. Box 13326, Austin, Texas 78711-3326.

Dated: May 2, 2016

Respectfully Submitted,

Margaret Uhlig Pemberton
Division Director-Legal Division

Stephen Mack
Managing Attorney-Legal Division



Jacob Lawler
Attorney-Legal Division
State Bar No. 24076502
(512) 936-7295
(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 May 2, 2016,
in accordance with 16 TAC § 22.74.



Jacob Lawler

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DEFINITIONS

- A. "Manville WSC" or "Lakeside WCID 1", "you" refers to the Manville Water Supply Corporation and Lakeside Water Control Improvement District 1 and any person acting or purporting to act on their behalf, including without limitation, attorneys, agents, advisors, investigators, representatives, employees or other persons.
- B. "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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INSTRUCTIONS

- 1) Pursuant to 16 TAC § 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 16 TAC § 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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For Lakeside WCID 1

Please provide the following:

- Staff 1-1 Proof of notice to Williamson County.
- Staff 1-2 Copy of the service agreement given to customers in the proposed service area.
- Staff 1-3 Facility map of the proposed service area that shows distribution and transmission lines, as well as the location of the interconnect with Manville WSC.
- Staff 1-4 Water supply contract between Manville WSC and Lakeside Water Control and Improvement District (WCID) 1 demonstrating that 0.6 gallons per minute is provided for the 533 existing connections which verifies the continuity and adequacy of service required for CCN areas.
- Staff 1-5 Clarification of the current (active) connection count and the overall proposed connection count for Lakeside WCID 1 in the proposed service area.
- a) For customers being served in the proposed service area, please state which entity the customers have retail service agreements with.
 - b) If customers in the proposed area have retail service agreements with entities other than Lakeside WCID 1, please state if these customers will be requested to sign new customer service agreements with Lakeside WCID 1 if the CCN application is approved.
 - c) Upon issuance of the CCN to Lakeside WCID 1, describe expected changes, if any, of the following items for the customers within the proposed service area:
 - i. Water Service Provider
 - ii. Wastewater Service Provider
 - iii. Rates for Water and Wastewater Service
 - iv. Billing Provider

- Staff 1-6 State which entity (Lakeside WCID 1, Pflugerville or Manville) is responsible for TCEQ monthly, quarterly, and annual drinking water compliance sampling in the proposed service area.
- Staff 1-7 Written documentation from the City of Pflugerville allowing the decertification of a portion of its sewer CCN No. 20678.
- Staff 1-8 Written proof that the water, wastewater and professional services contracts filed in this docket between Manville WSC, Kelly Lane Utility, City of Pflugerville, and Lakeside WCID 1, are still current, true and correct.
- Staff 1-9 Documentation showing Lakeside WCID 1 has requested a public water supply (PWS) identification number from TCEQ or a copy of the TCEQ PWS approval letter and PWS identification number for Lakeside WCID 1.