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No. 42932

APPLICATION OF MANVILLE
WATER SUPPLY CORPORATION
AND LAKESIDE WCID DISTRICTS
FOR APPROVAL OF SERVICE
AGREEMENTS IN TRAVIS COUNTY
(37792-c)

2015 FEB 19 AM 9:19
PUBLIC UTILITY COMMISSION
OF TEXAS

RESPONSE OF MANVILLE WATER SUPPLY
CORPORATION TO ORDER NO. 4
REQUIRING SUPPLEMENTAL INFORMATION

Pursuant to Order No. 4, Manville Water Supply Corporation presents this it's Supplemental Information. THE STATEMENT OF JURISDICTION CONTAINED IN STAFF'S RESPONSE TO ORDER NO.3 AND REQUEST FOR SUPPLEMENTAL INFORMATION IS CORRECT.

1. Manville Water Supply Corporation ("Manville") is a member owned non-profit retail water utility, providing service in Travis, Williamson, Bastrop and Lee Counties pursuant to a Certificate of Convenience and Necessity. Manville is active as both a wholesale and a retail water utility. Manville serves approximately 8000 retail customers (it's members) and also provides wholesale water to various other utilities, indirectly serving approximately 20,000 LUEs through wholesale water supply contracts.
2. Manville provides and has provided wholesale water to the Lakeside WCID districts since their creation. The districts were developer-created for the purpose of providing retail water service to their residents. Manville is the sole source of wholesale water to the districts.
3. The land encompassing the districts has historically been in the Manville CCN area, but was undeveloped and had no water facilities or customers in place prior to creation of the districts.
4. Although the lands within the district have remained singly certificated to Manville and within the Manville CCN area, the districts have been and are the sole source of retail water within their boundaries.
5. The wholesale water supply contract between Manville and the districts provides that the districts may, at their option, apply for their own CCN and the lands within the district boundaries may be transferred to the district's CCN, if granted. That is the purpose of this pending application. Manville joins with the districts in the applications, and has no objection to the granting of CCNs to the districts,
6. If the applications in Docket Nos. 42931, 42932, 42933, 42934 and 42935 are ultimately approved, Manville will retain all of its service area and its CCN, with the exception of the property within the boundaries of these districts. The property within these districts constitutes an insignificantly small portion of Manville's service area, and is property to which Manville does not and has never provided retail service.

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7. No part of Manville's public water system is affected by this application. No Manville facilities, infrastructure, and no part of its public water system will transfer. Manville will continue to provide wholesale water to the districts, as it has done since their creation.
8. Staff's interpretation of the application is correct. The portion of Manville's CCN that lies within the boundaries of the Lakeside districts is to transfer to Lakeside's new CCN. Manville's CCN is to be amended to reflect the transfer. The Lakeside WCID districts are to be granted new CCNs as appropriate.
9. Manville views the transfer as insignificant and unnecessary, since it has no interest in providing retail service within the boundaries of the districts and nothing about the applications will alter the status quo in terms of retail service to the districts' residents. Manville has joined in the districts' applications as an accommodation to the districts and pursuant to the existing wholesale water supply contract, but has no further interest in the outcome of this proceeding.

Signed this 19 day of February, 2015,

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ATTORNEYS FOR MANVILLE WSC

CERTIFICATE OF SERVICE

I certify that a true copy of this document was served on all parties of record this 19 day of February 2015 in accordance with PUC Procedural Rule 22.74.

A handwritten signature in black ink, appearing to read 'K. Moeller', is written over a horizontal line.

Karl H. Moeller