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February 9, 2016

Honorable Susan E. Goodson
Administrative Law Judge
Public Utility Commission
Central Records -- Room 8-100
1701 N. Congress Avenue
Austin, Texas 78701

VIA HAND-DELIVERY

Re: **PUC Docket No. 42934**; Application of Manville Water Supply Corporation and Lakeside Water Control and Improvement District 2C ("**District**") for Approval of a Service Agreement in Travis County (37795s-C)

Dear Administrative Law Judge Goodson:

On January 7, 2016, Public Utility Commission ("**PUC**") Staff filed its Response to PUC Order No. 8 indicating that the above-referenced application was administratively incomplete and deficient. On January 13, 2016, Order No. 9 was issued, affirming the PUC's Staff's findings and requiring the District to cure such deficiencies by February 9, 2016. Accordingly, the District submits the following responses to address the issues raised by PUC Staff regarding administrative completeness. The District will address the technical review deficiencies upon notification of administrative completeness. The following items are delineated in Commission Staff's Memorandum:

Mapping Content

- The revised digital data received on December 4, 2015, does not remove the overlaps of the proposed area with the corporate boundaries of the City of Pflugerville as stated by the Applicant. The overlaps were determined using the City of Pflugerville's current corporate boundaries available for download from their website.

RESPONSE: The District is providing revised digital data, attached as Attachment A.

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The District would also like to respond to the ALJ's comment in Order No. 9 that the application was initiated in November 2013 and is still not administratively complete and that PUC Staff should comment on whether the application should be dismissed. The District notes that it has worked diligently with PUC Staff (and previously TCEQ Staff- who had found the maps acceptable) to address the PUC's concerns with the application maps, including meeting with PUC Staff in person and through internet and telephonic conferences. It is the District's understanding that many of the PUC's concerns with the District's maps have resulted from digital data coming from multiple sources that do not accurately reflect the City's metes and bounds descriptions, and the District is continuing to cooperate with PUC Staff to alleviate those concerns. To this end, the District believes the digital data submitted with this filing will correct any perceived deficiencies in the application, and the District urges the PUC and Administrative Law Judge to forgo dismissing the application if a defect remains.

If there are any questions regarding this submittal, I can be reached at 512-322-5804 or cdickenson@lglawfirm.com.

Sincerely,



Christie L. Dickenson

CLD/dsr
Enclosure

cc: Keith Collins, District engineer (w/o enclosures)

Attachment A
Revised Digital Data