



Control Number: 42934



Item Number: 36

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DOCKET NO. 42934

**APPLICATION OF MANVILLE WATER §
SUPPLY CORPORATION AND §
LAKESIDE WATER CONTROL §
IMPROVEMENT DISTRICT 2C FOR §
APPROVAL OF A SERVICE §
AGREEMENT IN TRAVIS COUNTY §
(37792-C) §**

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**COMMISSION STAFF'S FIRST REQUEST FOR
INFORMATION TO MANVILLE WATER SUPPLY
CORPORATION (MANVILLE WSC) AND LAKESIDE WATER
CONTROL AND IMPROVEMENT DISTRICT 2C (LAKESIDE WCID 2C)
QUESTION NOS. STAFF 1-1 THROUGH STAFF 1-8**

Pursuant to 16 Tex. Admin. Code (TAC) § 22.144, the Staff of the Public Utility Commission of Texas (Staff) requests that Manville Water Supply Corporation and Lakeside Water Control and Improvement District 2C 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: June 1, 2016

Respectfully Submitted,

**PUBLIC UTILITY COMMISSION OF TEXAS
LEGAL DIVISION**

Margaret Uhlig Pemberton
Division Director-Legal Division

Stephen Mack
Managing Attorney - Legal Division



Jacob Lawler
State Bar No. 24076502
1701 N. Congress Avenue
P.O. Box 13326
Austin, Texas 78711-3326
(512) 936-7275
(512) 936-7268 (facsimile)

CERTIFICATE OF SERVICE

I certify that a copy of this document will be served on all parties of record June 1, 2016,
in accordance with 16 TAC § 22.74.



Jacob Lawler

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DEFINITIONS

- 1) "Manville WSC", "Lakeside WCID 2C", "the Company" or "you" refers to Manville Water Supply Corporation and Lakeside Water Control and Improvement District 2C and any person acting or purporting to act on their behalf, including without limitation, attorneys, agents, advisors, investigators, representatives, employees or other persons.
- 2) "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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QUESTION NOS. STAFF 1-1 THROUGH STAFF 1-8**

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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- Staff 1-1 Please provide a copy of the service agreement given to customers in the proposed service area.
- Staff 1-2 Please provide a facility map of the proposed service area that shows distribution and transmission lines, as well as the location of the interconnect with Manville WSC. Please ensure that the map is large enough to show the lines clearly.
- Staff 1-3 Please provide the water supply contract between Manville WSC and Lakeside Water Control and Improvement District (WCID) 2C. If previously provided, please identify where the contract is located in the application. Also, please provide the contracted amount of purchase water allowed to be purchased by Lakeside WCID 2C per month from Manville WSC. If the contract is not individualized for each Lakeside WCID 1, 2A, 2B, 2C and 2D please provide total connection counts, existing and proposed, and total contracted amount and verify that the contracted amount will be enough to provide 0.6 gallons per minute per connection.
- Staff 1-4 Please provide the current (active) connection count and the overall proposed connection count for Lakeside WCID 2C in the proposed service area. Also:
- 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 2C, please state if these customers will be requested to sign new customer service agreements with Lakeside WCID 2C if the CCN application is approved.
 - c) Upon issuance of the CCN to Lakeside WCID 2C, describe 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 1-5 Please state which entity (Lakeside WCID 2C, Pflugerville or Manville) is responsible for TCEQ monthly, quarterly, and annual drinking water compliance sampling in the proposed service area.
- Staff 1-6 Please provide 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 2C, are still current, true and correct.
- Staff 1-7 Approval letters were submitted with this application showing plans for water were approved for The Park at Blackhawk II, The Estates of Rowe Lane, Speidel Drive Phase 1, The Park at Blackhawk II Phase 2A and The Park at Blackhawk II Phase 2B under Manville WSC, Public Water System (PWS) ID 2270033. Please provide plan approval letters showing approval under Lakeside WCID No. 2C for the water plans pertaining to this area.
- Staff 1-8 Approval letters were submitted with this application showing plans for wastewater were approved for The Park at Blackhawk II Phase 1, Speidel Drive Phase 1, Pflugerville North Wastewater Interceptor, The Estates of Rowe Lane - Section 1 & Section 2, The Park at Blackhawk II Phase 2 and The Park at Blackhawk II - Jakes Hill Road & Martin Lane under Kelly Lane Utility Discharge Permit No. 13219-001. Please provide plan approval letters showing approval under Lakeside WCID No. 2C for the wastewater plans pertaining to this area.