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SOAH Docket No. 473-15-2274  
PUC Docket No. 43175

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APPLICATION OF COMMUNITY  
WATER SERVICE, INC. and  
WALTER J. CARROLL CO., INC.  
INVESTORS, LP, FOR SALE, TRANSFER,  
OR MERGER OF FACILITIES AND  
CERTIFICATE RIGHTS IN ELLIS COUNTY

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BEFORE THE PUBLIC UTILITY COMMISSION  
STATE OFFICE  
FILING CLERK  
OF  
ADMINISTRATIVE HEARINGS

APPLICATION NO. 37981-S

SUPPLEMENTAL  
DIRECT PRE-FILED TESTIMONY OF  
BONNIE FRAME

IN SUPPORT OF

APPLICANTS,  
COMMUNITY WATER SERVICE, INC.

and

WALTER J. CARROLL CO., INC.'S  
APPLICATION FOR SALE, TRANSFER OR MERGER OF FACILITIES AND  
CERTIFICATE RIGHTS IN ELLIS COUNTY, TEXAS

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44

SOAH Docket No. 473-15-2274  
PUC Docket No. 43175

APPLICATION OF COMMUNITY §  
WATER SERVICE, INC. and § BEFORE THE STATE OFFICE  
WALTER J. CARROLL CO., INC. §  
INVESTORS, LP, FOR SALE, TRANSFER, § OF  
OR MERGER OF FACILITIES AND § ADMINISTRATIVE HEARINGS  
CERTIFICATE RIGHTS IN ELLIS COUNTY §

APPLICATION NO. 37981-S

SUPPLEMENTAL AND REBUTTAL PRE-FILED DIRECT TESTIMONY OF  
BONNIE FRAME

IN SUPPORT OF

APPLICANTS,  
COMMUNITY WATER SERVICE, INC.

and

WALTER J. CARROLL CO., INC.'S  
APPLICATION FOR SALE, TRANSFER OR MERGER OF FACILITIES AND  
CERTIFICATE RIGHTS IN ELLIS COUNTY, TEXAS

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My name is Bonnie Frame. I am employed by Community Water Service, Incorporated. This testimony is intended to supplement my pre-filed direct testimony previously filed in this matter.

I am over the age of 18 years and fully competent to testify to the matter stated in this affidavit. I have personal knowledge of the facts and statements contained in this affidavit and each of them is true and correct. I am the Business Administrator and a custodian of the records for Community Water Service, Inc. and am authorized to make this affidavit on behalf of Community Water Service, Inc. Attached to this affidavit are 4 pages of records from Community Water Service, Inc., labeled as follows:

- EXHIBIT A-23 (1-page record) – Community Water Systems Water Line and Distribution Plat for Beckley Pike Estates, Ellis County, Texas, with fire hydrant locations indicated.
- EXHIBIT A-31 (1-page record) – Order, dated May 18, 1994, from the Texas Natural Resource Conservation Commission granting Community Water Service, Inc.'s

application for amendment to Water Certificate of Convenience and Necessity Number 10091 in Ellis County, Texas.

- EXHIBIT A-32 (2-page record) - Certificate of Convenience and Necessity Number 10091, issue date June 3, 1994, from the Texas Natural Resource Conservation Commission.
- EXHIBIT A-33 (1-page record) – Community Water Systems Water Line and Distribution Plat for Beckley Pike Estates, Ellis County, Texas, with valve locations indicated.

These records are kept by Community Water Service, Inc. in the regular course of business, and it was the regular course of business of Community Water Service, Inc. for an employee or representative, with knowledge of the acts, events, conditions, opinions, or diagnoses that were recorded, to make these records or to transmit the information to be included in these records. The records were made at or near the time or reasonably soon after the acts, events, conditions, opinions, or diagnoses that were recorded. The records attached to this affidavit are the originals or the exact duplicates of the originals.

As shown on Exhibit 33, the distribution lines servicing the Beckley Pike Estates are 2-inches, 3-inches and 4-inches, which are further described as follows:

- The distribution lines on Overlook Drive, Carson Street, Moreview Street within the Beckley Pike Estates are 2-inch lines.
- The distribution line on Baldwin Street is a 3-inch line.
- The distribution line on Dana Street to the service road to U.S. Highway 77 (Beckley Pike) is a 4-inch distribution line.

There are 9 valves serving the distribution lines within the Beckley Pike Estates. Each valve is indicated on Exhibit 33 as a black triangle and are further described as follow:

- There is one 2-inch valve in front of the well house at the far north end of Carson Street.
- There is one 2-inch valve behind the well house.
- There is one 2-inch valve on Carson street near lots indicated as 24 and 25 on Exhibit 23.
- There is one 2-inch valve on Overlook Drive near lot 28 indicated on Exhibit 23.
- There are four 3-inch valves on Baldwin Street, each indicated on Exhibit 23.

- There is one 4-inch valve serving a 4-inch water distribution line east of the well house indicated on Exhibit 23.

Currently, there are approximately 117 connections in the Beckley Pike Estates.

Also, there are 7 fire hydrants in the Beckley Pike Estates. It is my understanding that these hydrants are owned by the City of Red Oak, Texas. Each fire hydrant's approximate location is indicated on Exhibit 23.

Since Community Water Service has owned and operated the public retail water distribution system in and throughout Beckley Pike Estates in Ellis County, Texas, Community Water Service has never had a customer complain that there are insufficient fire suppression capabilities.

Since Community Water Service has owned and operated the public retail water distribution system in the Beckley Pike Estates in Ellis County, Texas, Community Water Service has never had an incident with the adequacy of the fire suppression systems that service the Beckley Pike Estates.

Since Community Water Service has owned and operated the public retail water distribution system in the Beckley Pike Estates in Ellis County, Texas, Community Water Service has never had an incident with the water lines being frozen, broke or tampered with due to the depth of the water lines.

Since Community Water Service has owned and operated the public retail water distribution system in the Beckley Pike Estates in Ellis County, Texas, Community Water Service has never had a customer complain about the depth of the water lines, or that the water lines froze, broke or were tampered with due to the depth of the water lines.

Based on my experience, and based on a long track record in operating the public retail water distribution system operated by Community Water Service in the Beckley Pike Estates in Ellis County, Texas, the distribution system has sufficient facilities to serve the public interest and the water distribution lines are at an appropriate depth to prevent freezing, breakage and tampering.

Subject to review of further documentation and the testimony of any other witnesses submitted by the Commission or any other interested party, this concludes my supplemental direct testimony.

APPLICATION OF COMMUNITY §  
WATER SERVICE, INC. and § BEFORE THE STATE OFFICE  
WALTER J. CARROLL CO., INC. §  
INVESTORS, LP, FOR SALE, TRANSFER, § OF  
OR MERGER OF FACILITIES AND § ADMINISTRATIVE HEARINGS  
CERTIFICATE RIGHTS IN ELLIS COUNTY §

APPLICATION NO. 37981-S

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STATE OF TEXAS §  
§  
COUNTY OF ELLIS §

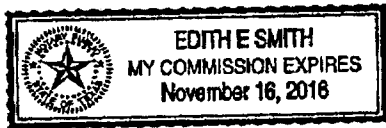
BONNIE FRAME, upon first being duly sworn according to law, under oath deposes and states: That I have read the foregoing Direct Testimony and referenced Exhibits and they are true and accurate representations of what the testimony would be if the testimony were to be given orally at the time the written testimony is offered into evidence.

SIGNED this the 30<sup>th</sup> day of July, 2015.

Bonnie Frame  
BONNIE FRAME

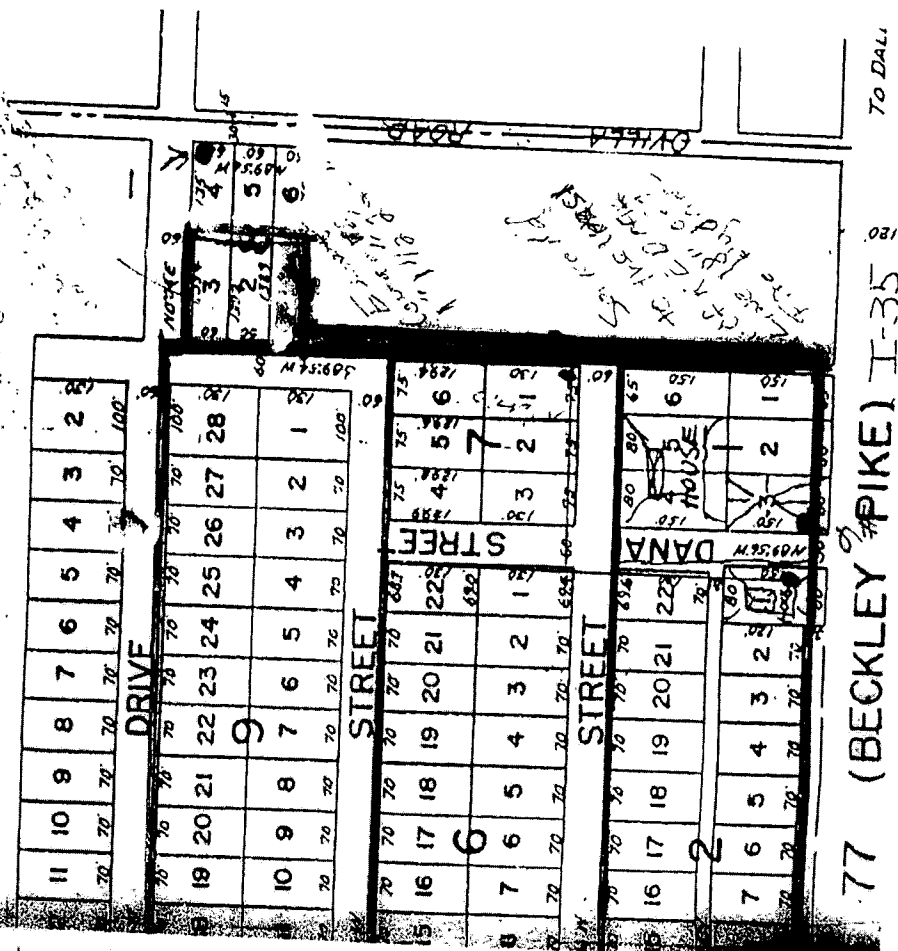
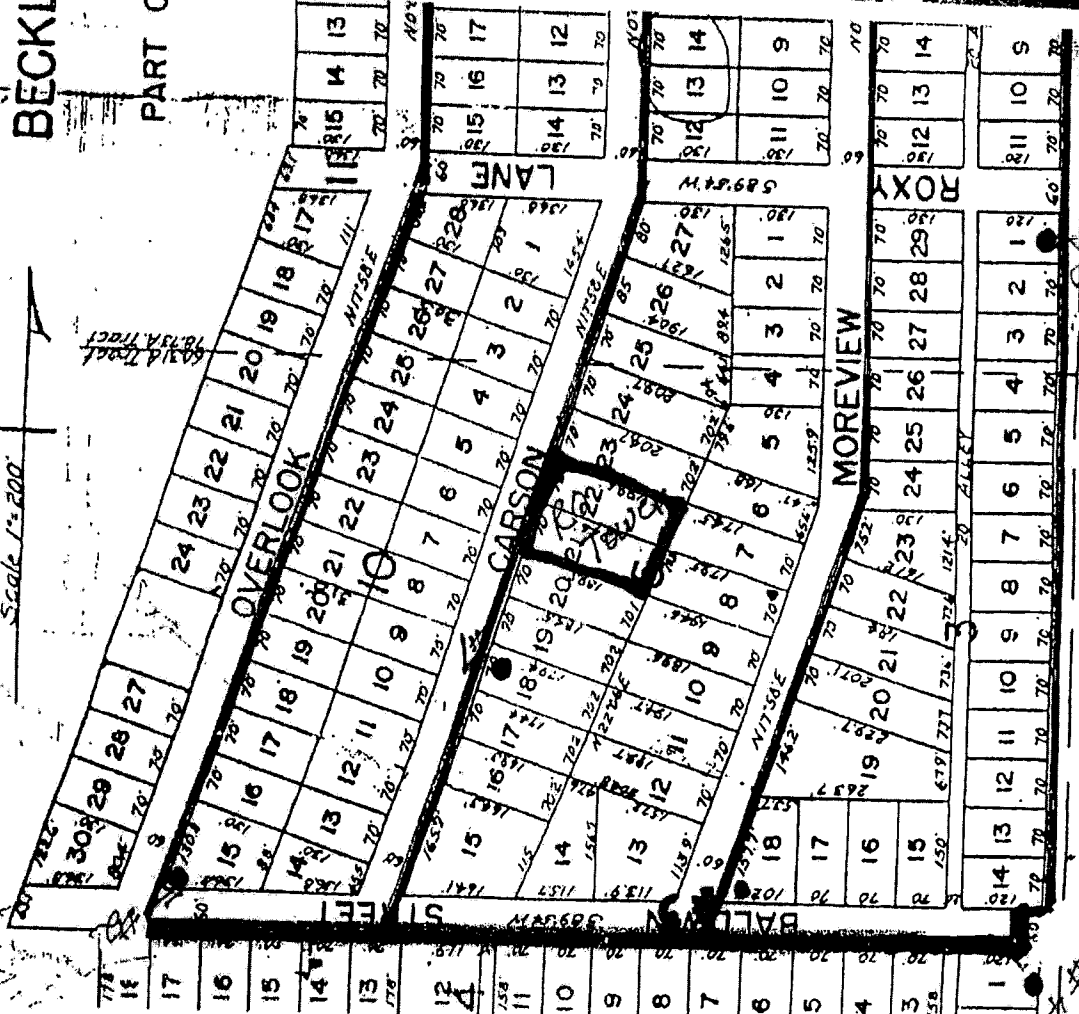
SUBSCRIBED AND SWORN to before me this the 30 day of July, 2015.

Edith E. Smith  
NOTARY PUBLIC, STATE OF TEXAS



BECKLEY PIKE ESTATES, REVISED  
 ELLIS COUNTY, TEXAS  
 PART 0 - THE J.A. RAWLINS SURVEY ABST. 907

Scale 1"=200'



I-35 EXPRESSWAY U.S. HIGHWAY N

77 (BECKLEY PIKE) I-35

To DAL.



*F*  
*Community*  
*Water*

TEXAS NATURAL RESOURCE CONSERVATION COMMISSION



APPLICATION NO. 30332-C

IN THE MATTER OF THE APPLICATION	§	BEFORE THE
OF COMMUNITY WATER SERVICE, INC.	§	
TO AMEND WATER CERTIFICATE OF	§	TEXAS NATURAL RESOURCE
CONVENIENCE AND NECESSITY NUMBER	§	
10091 IN ELLIS COUNTY, TEXAS	§	CONSERVATION COMMISSION

ORDER

On MAY 18 1994, the Texas Natural Resource Conservation Commission pursuant to Chapter 13 of the Texas Water Code considered the application of Community Water Service, Inc. to amend Water Certificate of Convenience and Necessity Number 10091 in Ellis County. After considering the evidence, including the staff recommendation, the Commission finds that:

No person has requested a public hearing on the application;

Notice of the application was given all affected and interested parties;

The City of Red Oak, holder of Certificate of Convenience and Necessity No. 11074, and the applicant agree to dual certification for the area affected by the application;

The criteria set forth in Section 13.246(c) have been considered by the Commission; and

Granting the application is necessary for the service, accommodation, convenience and safety of the public.

NOW, THEREFORE, BE IT ORDERED BY THE TEXAS NATURAL RESOURCE CONSERVATION COMMISSION that the application is granted and Certificate of Convenience and Necessity Number 10091, issued to Community Water Service, Inc., is amended in accordance with the terms and conditions set forth herein and in the certificate.

IT IS FURTHER ORDERED that Community Water Service, Inc. shall serve every customer and applicant for service within the area certified under Certificate of Convenience and Necessity Number 10091 and that such service shall be continuous and adequate

Issued Date: JUN 03 1994

**EXHIBIT A-31**

TEXAS NATURAL RESOURCE  
CONSERVATION COMMISSION

ATTEST:

*Gloria A. Vasquez*  
Gloria A. Vasquez, Chief Clerk

Page 12

*John Hall*  
John Hall, Chairman

# TEXAS NATURAL RESOURCE CONSERVATION COMMISSION



## CERTIFICATE OF CONVENIENCE AND NECESSITY

To Provide Water Service Under V.T.C.A., Water Code  
and Texas Natural Resource Conservation Commission Substantive Rules

Certificate No. 10091

### I. Certificate Holder:

Name: Community Water Service, Inc.

Address: P. O. Box 17687  
Dallas, Texas 75217

### II. General Description and Location of Service Area:

The areas covered by this certificate are located in Dallas, Denton and Ellis Counties as follows:

#### DALLAS COUNTY

Service Area #1 - Grand Prairie: Located approximately 13 miles west of downtown Dallas, on County Line Road, and generally bounded on the north by Tarrant Road, on the south by School House Road, on the east by County Line Road, and on the west by the Tarrant-Dallas county line.

Service Area #2 - Danieldale: Located approximately 10½ miles south of downtown Dallas, on Wintergreen Road, and generally bounded on the north by W. Danieldale Road, on the south by Wintergreen Road, on the east by Interstate Highway 35E, and on the west by a tributary of Tenmile Creek.

#### DENTON COUNTY

Service Area #1 - Rocky Point: Located approximately 10 miles southeast of downtown Denton, on Garza Road, and generally bounded on the north by Easy Street, on the east by Garza Road, and on the west by Lewisville Lake.

#### ELLIS COUNTY

Service Area #1 - Red Oak (Beckley Pike Estates): Located approximately 10 miles north of downtown Waxahachie, on Interstate Highway 35E, and generally bounded on the north by Ovilla Road, on the east by Interstate Highway 35E and on the west by Overlook Drive. Dual certification exists over the entire area with the City of Red Oak, CCN No. 11074-13

**EXHIBIT A-32**

III. Certificate Maps:

The certificate holder is authorized to provide water service in the areas identified on the Commission's official service area maps, WRS-057, WRS-061 and WRS-71, maintained in the offices of the Texas Natural Resource Conservation Commission, 12015 Park 35 Circle, Austin, Texas with all attendant privileges and obligations.

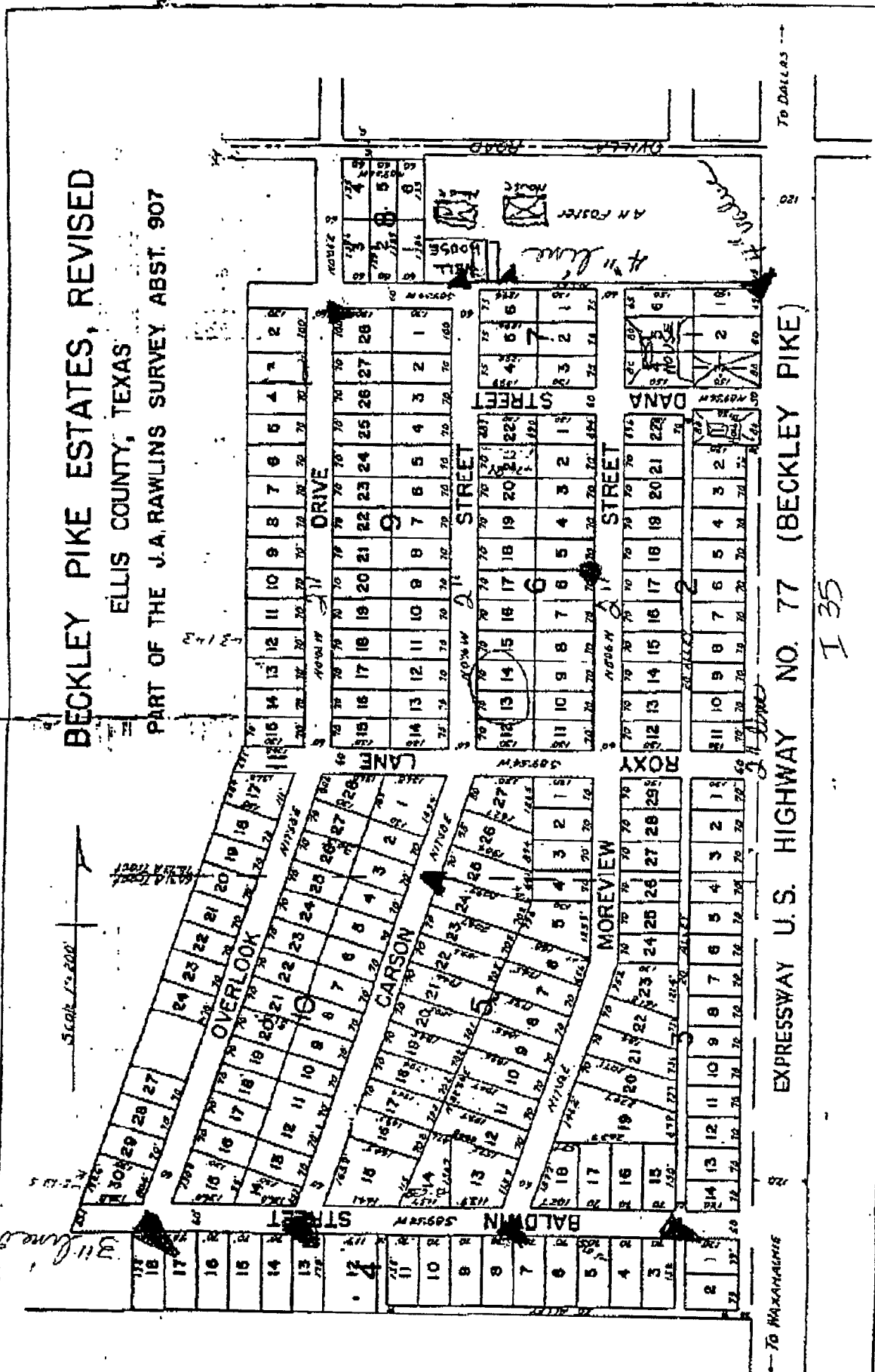
This certificate is issued under Application No. 30332-C and subject to the rules and orders of the Commission, the laws of the State of Texas, conditions contained herein and may be revoked for violations thereof. The certificate is valid until amended or revoked by the Commission.

Issued Date: JUN 03 1994

ATTEST: *Melvin A. Casquey* *John Hill*  
For the Commission

COMMUNITY WATER SYSTEM  
Red Dak System  
ID # 0700056

BECKLEY PIKE ESTATES, REVISED  
ELLIS COUNTY, TEXAS  
PART OF THE J.A. RAWLINS SURVEY ABST. 907



TO DALLAS

EXPRESSWAY U.S. HIGHWAY NO. 77 (BECKLEY PIKE)

I 35

3" WATER LINE

2" WATER LINES  
VALVES  
SAMPLE SITE LOCATIONS

EXHIBIT A-33