



Control Number: 43378



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**DOCKET NO. 43378**

**APPLICATION OF THE CITY OF  
MANOR TO AMEND A CERTIFICATE  
OF CONVENIENCE AND NECESSITY  
IN TRAVIS COUNTY (37972-C)**

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§

**PUBLIC UTILITY COMMISSION  
OF TEXAS**  
2015 APR 21 10:00  
FILING CLERK

**COMMISSION STAFF'S FIRST REQUEST FOR INFORMATION  
TO THE CITY OF MANOR  
QUESTION NOS. STAFF 1-1 THROUGH STAFF 1-3**

Pursuant to § 22.144 of the Commission's Procedural Rules, the Staff of the Public Utility Commission of Texas (Staff) requests that the City of Manor (the "Manor") 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: April 2, 2015

Respectfully Submitted,

Margaret Uhlig Pemberton  
Division Director-Legal Division

Shelah J. Cisneros  
Managing Attorney-Legal Division



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Katherine Lengieza Gross  
Attorney-Legal Division  
State Bar No. 24065610  
(512) 936-7277  
(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 on April 2, 2015, in accordance with P.U.C. Procedural Rule 22.74.



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Katherine Lengieza Gross

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**COMMISSION STAFF'S FIRST REQUEST FOR INFORMATION  
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QUESTION NOS. STAFF 1-1 THROUGH STAFF 1-3**

**DEFINITIONS**

- A. **“Manor”**, **“the Company”** or **“you”** refers to the City of Manor 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 P.U.C. PROC. R. 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 P.U.C. PROC. R. 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 copies of the purchase water agreements from Blue Water LP and any other entity from whom Applicant is purchasing water.
- Staff 1-2** Has the Utility System within the proposed CCN area (referenced by the restated, revised, and amended agreement regarding the creation and operation of the Presidential Glen Municipal Utility District) been conveyed to the City for operation and maintenance?
- Staff 1-3** Provide documentation that demonstrates that the City is in compliance with the violation cited by the TCEQ on April 24, 2014 for failure to have a plant operations manual.