



Control Number: 43422



Item Number: 13

Addendum StartPage: 0

**PUC DOCKET NO. 43422**

**APPLICATION OF QUADVEST, L.P. TO §  
AMEND A CERTIFICATE OF §  
CONVENIENCE AND NECESSITY IN §  
HARRIS COUNTY (37992-C) §**

**PUBLIC UTILITY COMMISSION**

FILED FEB 26 AM 10:37  
OF TEXAS  
FILING CLERK

**COMMISSION STAFF'S RESPONSE TO ORDER NO. 5**

COMES NOW the Staff (Staff) of the Public Utility Commission of Texas (Commission), representing the public interest, and files this Response to Order No. 3 and Motion to Dismiss, and would show the following:

**I. BACKGROUND**

On January 31, 2014, the Texas Commission on Environmental Quality (TCEQ) received an application from Quadvest, L.P. (Quadvest) to amend its water certificate of convenience in Harris County, Texas. On September 1, 2014, the processing of the application was transferred to the Commission. Order No. 5 was issued on February 11, 2015, which required Quadvest to file additional information addressing deficiencies in its application by February 13, 2015, and requiring Staff to file a supplemental application by February 27, 2015. Accordingly, this response is timely filed.

**II. RECOMMENDATION AND MOTION TO DISMISS**

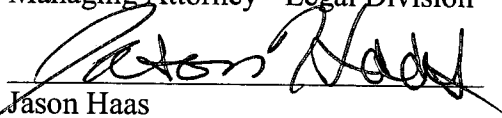
Additional information from Quadvest was received by the Commission on February 10, 2015. Based on the attached memorandum from Debbie Reyes Tamayo, Program Specialist and Tracy Harbour, GIS Specialist, of the Water Utility Division, Staff finds that the additional information is insufficient for filing. Staff recommends that Quadvest be given 30 days to correct the deficiencies in the application as noted in the memorandum from Staff, and that Staff have 30 days to review the additional information for sufficiency.

**DATED: February 26, 2015**

Respectfully Submitted,

Margaret Uhlig Pemberton  
Division Director - Legal Division

Karen S. Hubbard  
Managing Attorney - Legal Division

  
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**CERTIFICATE OF SERVICE**

I certify that a copy of this document will be served on all parties of record on February 26, 2015, in accordance with P.U.C. Procedural Rule 22.74.

  
Jason Haas

## PUC Interoffice Memorandum

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**To:** Jason Haas  
Legal Division

**Thru:** Tammy Benter, Director  
Water Utilities Division

**From:** Debbie Reyes Tamayo, Program Specialist  
Tracy Harbour, GIS Specialist  
Water Utility Division

**Date:** February 25, 2015

**Subject:** Docket No. 43422; Application of Quadvest, LP, to decertify a portion of their water Certificate of Convenience and Necessity (CCN) No. 11612 in Harris County

On July 24, 2014, Quadvest LP (Applicant) filed an application with the Texas Commission on Environmental Quality (TCEQ) to decertify a portion of Certificate of Convenience and Necessity (CCN) No. 11612 in Harris County, pursuant to the criteria in the Texas Water Code, Chapter 13, and the TCEQ's rules outlined in Title 30, Texas Administrative Code (TAC), Sections 291.109 and 291.112. On September 1, 2014, the rates and CCN programs were transferred from the TCEQ to the Public Utility Commission (PUC). This application was part of the transfer and is now under the PUC's purview. The application is now being reviewed under the PUC's Substantive Rules in Chapter 24, §§24.109 and 24.112.

### **Mapping:**

The applicant re-submitted maps on February 10, 2015. We have reviewed the maps, and found they do not meet mapping requirements; therefore, the application is insufficient for filing. The hand drawn maps and un-projected digital data of the proposed water service area submitted do not meet the mapping requirements as listed on page 5 of the CCN amendment application and as required in the P.U.C. SUBST. Rule in Chapter 24. Staff is unable to accurately determine the location of the proposed water service area being requested to be decertified from Quadvest.

To cure the remaining mapping deficiencies, Applicant must do the following:

1. Submit a general location (small scale) map delineating the proposed service area to be decertified from CCN No. 11612 with enough detail to accurately locate the proposed area within Harris County.
2. Submit a large scale map of the proposed service area clearly delineating the proposed service area to be decertified from CCN No. 11612 with enough detail to accurately locate the proposed service area in the vicinity of surrounding major and minor streets, roads, and highways.
3. Submit digital data only including the proposed service area in either an AutoCAD drawing (DWG) or shapefile (SHP) format on a data disk (CD):

- a. The proposed digital data must be a single, continuous polyline or polygon record, which is clearly labeled as the proposed service area.
- b. The proposed digital data must include the projection or coordinate system used to create the digital data. If submitting a DWG formatted file, please include the world (WLD) file.
- c. Label CD with the utility name and docket number assigned to this case.

The Applicant should not notice neighboring entities, customers, landowners or other parties until their digital data, maps, and notice documents have been approved by the Commission.

TB/DRT