



Control Number: 44028



Item Number: 30

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DOCKET NO. 44028

**APPLICATION OF THE CITY OF
THREE RIVERS TO AMEND A
CERTIFICATE OF CONVENIENCE
AND NECESSITY IN LIVE OAK
COUNTY (37900-C)**

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**PUBLIC UTILITY COMMISSION
OF TEXAS**

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FILING CLERK

**COMMISSION STAFF'S SECOND REQUEST FOR INFORMATION
TO THE CITY OF THREE RIVERS
QUESTION NOS. STAFF 2-1 THROUGH STAFF 2-4**

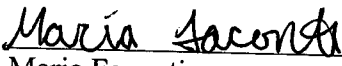
Pursuant to 16 Tex. Admin. Code § 22.144 (TAC) of the Commission's Procedural Rules, the Staff of the Public Utility Commission of Texas (Staff) requests that City of Three Rivers by and through its attorneys of record, provide the following information and answer the following question(s) under oath. 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: October 30, 2015

Respectfully Submitted,

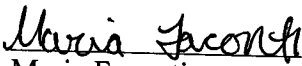
Margaret Uhlig Pemberton
Division Director-Legal Division



Maria Faconti
Attorney-Legal Division
State Bar No. 24078487
(512) 936-7235
(512) 936-7268 (facsimile)
Public Utility Commission of Texas
1701 N. Congress Avenue
P.O. Box 13326
Austin, Texas 78711-3326

DOCKET NO. 44028
CERTIFICATE OF SERVICE

I certify that a copy of this document will be served on all parties of record on October 30, 2015, in accordance with 16 TAC § 22.74.



Maria Faconti

DOCKET NO. 44028

**COMMISSION STAFF'S SECOND REQUEST FOR INFORMATION
TO THE CITY OF THREE RIVERS
QUESTION NOS. STAFF 2-1 THROUGH STAFF 2-4**

DEFINITIONS

- 1) "You" refers to the City of Three Rivers 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 City'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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**COMMISSION STAFF'S SECOND REQUEST FOR INFORMATION
TO THE CITY OF THREE RIVERS
QUESTION NOS. STAFF 2-1 THROUGH STAFF 2-4**

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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**COMMISSION STAFF'S SECOND REQUEST FOR INFORMATION
TO THE CITY OF THREE RIVERS
QUESTION NOS. STAFF 2-1 THROUGH STAFF 2-4**

- Staff 2-1** Please provide a description of the corrective actions taken to address the following outstanding TCEQ violations:
- a) Failure to initiate maintenance and housekeeping practices to ensure the good working condition of the automatic valve controlling the supplemental backwash, outstanding since August 12, 2011.
 - b) Failure to design ground storage tanks (Wheeler tanks) in strict accordance with TCEQ standards including having gooseneck or roof ventilator and a raised curbing of at least 4 inches with a lockable cover, outstanding since July 31, 2012.
- Staff 2-2** Please provide an explanation of the answer to 5.C. in the original application, which states that a facility component is operating above 85% of minimum standard capacity. Specifically, what are the provided capacities of the water plant at this time, and which components are operating above 85% capacity?
- a) If system improvements are necessary to maintain adequate capacity, include copies of engineering reports or any documentation submitted to TCEQ regarding the required improvements.
 - b) If system improvements are necessary to maintain adequate capacity, include the projected dates of completion for the required improvements.
- Staff 2-3** Please provide a map of the proposed service area indicating the location of existing water facilities, including distribution lines.
- Staff 2-4** Please provide a map of the proposed service indicating the location of existing customers and customers who have requested service, including the boundaries of the parcels of land mentioned in the City's response to the Commissions first RFI.