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## PUC DOCKET NO. 44046

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APPLICATION OF LAGUNA TRES, INC. AND LAGUNA VISTA, LTD. FOR SALE, TRANSFER AND MERGER OF FACILITIES AND CERTIFICATION RIGHTS IN HOOD COUNTY BEFORE THE PUBLICING CLERK

UTILITY COMMISSION

OF TEXAS

# APPLICANTS' ANSWERS TO PUC STAFF'S FIRST REQUESTS FOR INFORMATION

Pursuant to §22.144 of the Commission's Procedural Rules, Laguna Tres, Inc. ("LTI")

provides the following answers to Staff RFIs.

Respectfully submitted,

By:

Mark H. Zeppa // State Bar No. 22260100 Law Offices of Mark H. Zeppa, PC 4833 Spicewood Springs Road #202 Austin, Texas 78759-8435 (512) 346-4011, Fax (512) 346-6847 markzeppa@austin.twcbc.com

ATTORNEY FOR LAGUNA TRES, INC. AND LAGUNA VISTA, LTD.

### CERTIFICATE OF SERVICE

I, Mark H. Zeppa, certify that true and correct copies of the foregoing RFI answers were served as required by PUC Rule 22.74 on or before April 29, 2015.

Staff 1-1 Are Laguna Tres, Inc. and Laguna Vista, Ltd. affiliated? If so, please explain the affiliation.

Answer: Yes. They are under common ownership and control. Water Code 13.002(2)

Sponsor at trial: Charles Loy, CPA

Staff 1-2 Are Laguna Tres, Inc. and Laguna Vista, Ltd. under common ownership and control? If so, please provide an explanation of the common ownership and control.

Answer: Yes. Ike Thomas is the principal owner and CEO of both entities.

Sponsor at trial: Charles Loy, CPA

Staff 1-3 How does Laguna Tres, Inc. intend to treat the acquisition adjustment listed on page 7 of the application for rate-making purposes?

Answer: There are no plans at this time for the acquisition adjustment other than recording it in accordance with NARUC on the Company books. If the Company determines it should be included in a future rate case, justification for its inclusion will be made in accordance with Water Code 13.183(c) and 16 TAC 24.31(d).

Sponsor at trial: Charles Loy, CPA

## COUNTY OF TRAVIS

### AFFIDAVIT

I, Mark H. Zeppa, prepared the foregoing discovery answers based upon my personal knowledge, consultations with officers of the two affected entities, review of the Texas Secretary of State database, and consultations with the applicants' consultants. The answers are true and correct.

Mark H

SWORN AND SUBSCRIBED TO UNDER OATH before the undersigned notary public by Mark H. Zeppa on the 28<sup>th</sup> day of April, 2015.

Notary Public, State of Texas

SEAL

Joyce J Smith Notary Public State of Texas Commission Expires: 11/06/2017