



Control Number: 44541



Item Number: 13

Addendum StartPage: 0

PUC DOCKET NO. 44541

APPLICATION OF CITY OF HEATH  
TO AMEND A CERTIFICATE OF  
CONVENIENCE AND NECESSITY AND  
TO DECERTIFY A PORTION OF  
FORNEY LAKE WATER SUPPLY  
CORPORATION'S SERVICE AREA IN  
ROCKWALL COUNTY

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PUBLIC UTILITY COMMISSION  
OF  
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PUBLIC UTILITY COMMISSION  
FILING CLERK

**FORNEY LAKE WATER SUPPLY CORPORATION'S  
OBJECTIONS TO CITY OF HEATH'S FIRST REQUEST FOR INFORMATION**

TO THE HONORABLE PUBLIC UTILITY COMMISSION OF TEXAS:

COMES NOW Forney Lake Water Supply Corporation ("FLWSC") and files the following *Objections to the City of Heath's First Request for Information to FLWSC*.

The City of Heath served FLWSC with its First Request for Information on April 10, 2015.

Pursuant to Order No. 1 in this docket, these objections are timely filed. FLWSC objects to the following requests for information:

**Heath 1-2.** If any of Forney Lake's property may be rendered useless and valueless if single certification as requested by Heath in its application is granted, please identify each separate component of such property and provide the following information:

j. State whether Heath has requested through its application for single certification that the property conveyed be conveyed or transferred to Heath.

OBJECTION: FLWSC objects to the request in that it seeks FLWSC to speculate on the intent or desire of another party. Further, Heath's Application speaks for itself.

**Heath 1-6.** Please admit that Heath's application for single certification seeks authority to provide service solely to serve new customers not currently receiving service in specific tracts of land within Heath's corporate limits.

OBJECTION: FLWSC objects to the request in that it seeks FLWSC to speculate on the intent or desire of another party. Further, Heath's Application speaks for itself.

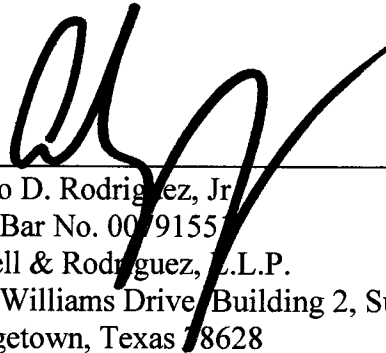
**Heath 1-8. Please admit that all of Forney Lake's water utility facilities currently used to provide retail water service to its customers before the grant of single certification as requested by Heath will continue to be used for that purpose after the single certification requested is granted.**

OBJECTION: FLWSC objects to the request in that it seeks FLWSC to speculate. Further, the request requires FLWSC to assume a legal conclusion that the application "will" be granted.

**CERTIFICATE OF CONFERENCE**

Counsel for FLWSC contacted counsel for City of Heath in an attempt to work through the objections. Contact with Heath's counsel was admittedly late. The undersigned still seeks to come to an agreement on FLWSC's limited objections.

Respectfully submitted,



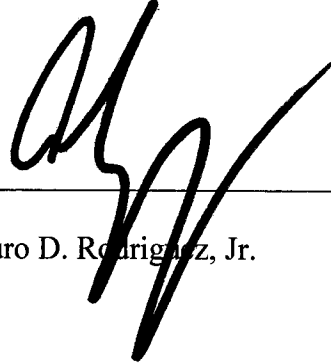
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ATTORNEY FOR FORNEY LAKE WATER  
SUPPLY CORPORATION

**CERTIFICATE OF SERVICE**

I hereby certify that on the 20<sup>th</sup> day of April, 2015, a true and correct copy of the foregoing document was served on all parties in accordance with PUC Procedural Rule 22.74.



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