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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

TEXAS

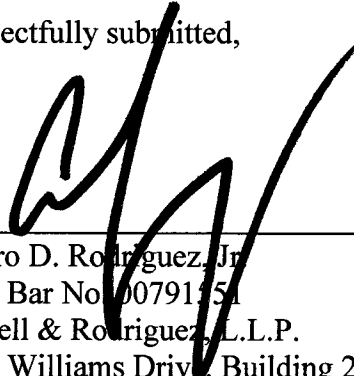
**FORNEY LAKE WATER SUPPLY CORPORATION'S
CLARIFICATION REGARDING DISCOVERY**

TO THE HONORABLE PUBLIC UTILITY COMMISSION OF TEXAS:

COMES NOW Forney Lake Water Supply Corporation ("FLWSC") and files the following *Clarification Regarding Discovery*.

On April 30, 2015, FLWSC provided all parties its Response to the City of Heath's First Request for Information. The discovery was served on all parties that same day. However, the discovery was not filed on the PUC's filing system inadvertently. Said error was a mistake. Attached hereto are the responses that were provided to all parties on April 30, 2015.

Respectfully submitted,



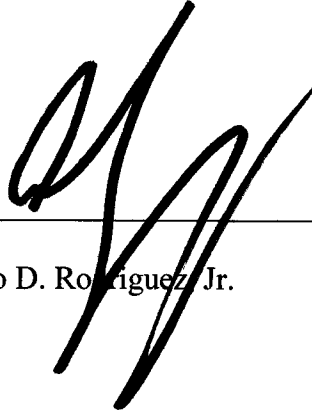
Arturo D. Rodriguez, Jr.
State Bar No. 00791151
Russell & Rodriguez, L.L.P.
1633 Williams Drive, Building 2, Suite 200
Georgetown, Texas 78628
T: (512) 930 1317
F: (866) 929-1641

ATTORNEY FOR FORNEY LAKE WATER
SUPPLY CORPORATION

23

CERTIFICATE OF SERVICE

I hereby certify that on the 8th day of May, 2015, a true and correct copy of the foregoing document was served on all parties in accordance with PUC Procedural Rule 22.74.



Arturo D. Rodriguez Jr.

A. J. Smullen
Attorney – Legal Division
Public Utility Commission of Texas
1701 N. Congress Avenue
P. O. Box 13326
Austin, Texas 78711-3326
Telephone: (512) 936-7289
Facsimile: (512) 936-7268
Representing the Public Utility Commission of Texas

Jim Mathews
Mathews and Freeland
327 Congress Avenue, Suite 300
Austin, Texas 78768-1568
Telephone: (512) 404-7800
Facsimile: (512) 703-2785
Representing City of Heath

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**PUBLIC UTILITY COMMISSION

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

Comes now Forney Lake Water Supply Corporation ("FLWSC") and files its Response to the City of Heath's First Request for Information. FLWSC received the City's request on April 10, 2015. This Response is therefore timely filed. All parties may treat the answers as if they were filed under oath.

FLWSC files these responses without agreeing to the relevancy of the information sought and without waiving its right to object at the time of hearing to the admissibility of the information provided herein.

FLWSC'S RESPONSES:

HEATH 1-1. 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 propose a time during regular business hours when Heath and its representatives may inspect such property.

a. Proposed date and time of inspection:

Counsel for FLWSC will work with City of Heath to coordinate a mutually agreeable time for inspection.

Prepared by Robin Baley; sponsoring witness Robin Baley.

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:

- a. The type or nature of the property (e.g. water lines, water storage facilities, pumps, valves, meters, vaults, easements, etc.).
 - b. The location or address of the property, and for water lines or easements the beginning and end point of the property that may be rendered useless or valueless.
 - c. A map depicting the location of the property in Forney Lake's system.
 - d. The size and capacity of the property.
 - e. The use of the property before single certification and the use of the property, if any, after single certification.
 - f. The year in which the property was placed in service.
 - g. Forney Lake's original cost to acquire and install the property.
 - h. Financing used to acquire the property
 - i. Forney Lake's current book value for the property.
 - j. **(Revised as Agreed)** Please admit that Heath's application does not indicate any assets or facilities to be transferred to Heath.
- a-i. FLWSC is gathering this information. This request will be supplemented.
- j. Heath's application does not appear to indicate any assets or facilities to be transferred to Heath

Responses a-i. Prepared by Eddy Daniel; sponsoring witness Eddy Daniel

Responses j. Prepared by Robin Baley; sponsoring witness Robin Baley.

HEATH 1-3 Please produce all documents concerning or relating to Forney Lake's belief that its property may be rendered useless and valueless if single certification as requested by Heath in its application is granted.

FLWSC is gathering this information. This request will be supplemented.

Prepared by Eddy Daniel; sponsoring witness Eddy Daniel

HEATH 1-4. Please provide all master plans, or other planning or engineering reports describing Forney Lake's water supply system used to supply retail water service within the corporate limits of Heath.

None.

Prepared by Robin Baley; sponsoring witness Robin Baley.

HEATH 1-5 Please identify any customers to whom Forney Lake currently provides retail water service within the tracts identified in "Attachment 12.A" of Heath's application for single certification.

FLWSC serves customers at the following addresses:

260 Terry Lane, 809 Hubbard, 405 Hubbard, 520 Meadowview, 206 Crips, 524 Hubbard, 300 Terry Lane, and 255 Meyers

Prepared by Robin Baley; sponsoring witness Robin Baley.

HEATH 1-6 WITHDRAWN BY AGREEMENT

HEATH 1-7. If Forney Lake contends that Heath's application for single certification requests authority to provide service to customers or areas currently receiving retail water service from Forney Lake, please provide the following information related that contention:

- a. Identity the language from Heath's application that supports this contention.
- b. Identify the customers or areas currently receiving retail water service from Forney Lake that you contend Heath's application will affect.
- c. Please produce all documents concerning or relating to that contention.

FLWSC has not made such a contention at this time.

Prepared by Robin Baley; sponsoring witness Robin Baley.

HEATH 1-8. **(Revised as Agreed)** 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 provided the single certification requested is granted.

At this time, FLWSC can admit. However, FLWSC reserves the right to amend.

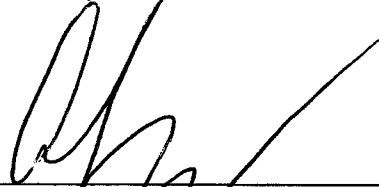
Prepared by Eddy Daniel; sponsoring witness Eddy Daniel

HEATH 1-9 If Forney Lake does not admit to RFI 1-8, please identify the specific components of Forney Lake's facilities that will not be used to provide water utility service to Forney Lake's existing customers following the grant of the single certification as requested by Heath.

N/A

Prepared by _____; sponsoring witness _____.

Respectfully submitted,

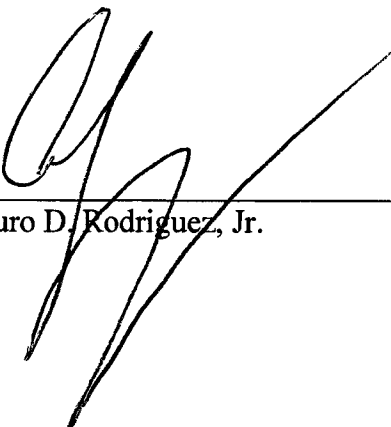


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ATTORNEY FOR FORNEY LAKE WATER
SUPPLY CORPORATION

CERTIFICATE OF SERVICE

I hereby certify that on the 30th 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.



Arturo D. Rodriguez, Jr.

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Attorney – Legal Division
Public Utility Commission of Texas
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