



Control Number: 44541



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DOCKET NO. 44541
SOAH DOCKET NO. 473-16-0193.WS

**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

2015 OCT -5 PM 2:29
FILING CLERK

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

Comes now the City of Heath (the "City" or "Heath") and files its Response to the Forney Lake Water Supply Corporation's ("Forney Lake's") First Request for Information. The City of Heath received the Forney Lake's request on August 24, 2015. By agreements pursuant to PUC Procedural Rule 22.144(k) filed in this case on September 2 and September 10, 2015, the response date to Forney Lake's request was extended to October 5, 2015. This response is therefore timely. All parties may treat the answers as if they were filed under oath.

The City of Heath files these responses without waiving its objections to the discovery requests previously filed on September 30, 2015.

Respectively submitted,



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Austin, Texas 78759
Telephone (512) 404-7800
Facsimile (512) 703-2785

Attorneys for the City of Heath

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CERTIFICATE OF SERVICE

I hereby certify that a true and correct copy of the City of Heath's Response to Forney Lake's First Request for Information was served on all parties of record in this proceeding on this 5th day of October, 2015, by hand-delivery, facsimile, electronic mail, and/or First Class Mail.

Arturo Rodriguez, Jr.
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A.J. Smullen
Attorney, Legal Division Public Utility Commission of Texas
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P.O. Box 13326
Austin, Texas 78711-3326
512-936-7268 (fax)

Jim Mathews

A handwritten signature in black ink, appearing to read "Jim Mathews", is written over a horizontal line.

PUC DOCKET NO. 44541
SOAH DOCKET 473-16-0193.WS
CITY OF HEATH'S RESPONSE TO FORNEY LAKE'S FIRST REQUEST FOR
INFORMATION

FLWSC 1-1 Please produce all documents concerning or relating to Heath seeking or preparing to provide retail water service within FLWSC's water certificate of convenience service area.

Response: Heath timely filed objections to this request on September 30, 2015. Subject to Heath's objections and PUC Procedural Rule 22.144(d) (4) responsive documents are being produced. Responsive documents can be found at <https://mandf.box.com/heathdocs>. Additional responsive documents are contained in Heath's pleadings filed in PUC Docket No. 44541.

Prepared by: Richard Dormier

Sponsored by: Richard Dormier

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CITY OF HEATH'S RESPONSE TO FORNEY LAKE'S FIRST REQUEST FOR
INFORMATION

FLWSC 1-2 Please produce all documents concerning or relating to any subdivision plats, sought or approved within FLWSC's water certificate of convenience service area.

Response: Forney Lake has agreed to limit this request to the area requested for single certification by Heath in its application.

Responsive documents can be found at <https://mandf.box.com/heatdocs>.

Prepared by: Richard Dormier

Sponsored by: Richard Dormier

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CITY OF HEATH'S RESPONSE TO FORNEY LAKE'S FIRST REQUEST FOR
INFORMATION

FLWSC 1-3 Please produce all documents, studies, reports, workpapers, or memoranda prepared by or for Heath that relate to a valuation of the FLWSC service area or any portion thereof or any facilities contained therein.

Response: Forney Lake has agreed to limit this request to documents relating to Heath's determination of the monetary amount that is adequate to compensate Forney Lake for any property rendered useless or valueless as a result of Heath's application.

Responsive documents can be found at <https://mandf.box.com/heathdocs>.

Prepared by: Richard Dormier

Sponsored by: Richard Dormier

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FLWSC 1-4 Please produce all documents, studies, reports, workpapers, or memoranda prepared by Jack Stowe or a firm he is associated with for Heath that relate to a valuation of the FLWSC service area or any portion thereof or any facilities contained therein.

Response: Forney Lake has agreed to limit this request to Heath's determination of the monetary amount that is adequate to compensate Forney Lake for any property rendered useless or valueless as a result of Heath's application.

Heath has no documents responsive to this request.

Prepared by: Jack Stowe

Sponsored by: Jack Stowe

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CITY OF HEATH'S RESPONSE TO FORNEY LAKE'S FIRST REQUEST FOR
INFORMATION

FLWSC 1-5 Please produce a map that indicates the corporate limits and extraterritorial jurisdiction of Heath.

Response: Responsive documents can be found at <https://mandf.box.com/heathdocs>.

Prepared by: Richard Dormier

Sponsored by: Richard Dormier