



Control Number: 44541



Item Number: 57

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**SOAH DOCKET 473-16-0193.WS  
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**  
2015 NOV 18  
PUBLIC UTILITY COMMISSION  
FILING CLERK  
**OF**  
**TEXAS**

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

Comes now Forney Lake Water Supply Corporation ("FLWSC") and files its Third Supplemental Response to the City of Heath's First Request for Information. 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 SUPPLEMENTAL RESPONSES:**

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.

RESPONSE:

- d. The size of the facilities are as indicated below:

8", 10" and 12" waterlines;  
200,000, and 2 ea. - 500,000 ground storage tanks;  
500,000 gallon elevated tank;  
3,000 GPM booster pump station;  
2 ea. - 1,500 GPM booster pumps and building;  
3 ea. - 1,500 GPM booster pumps and building;  
230 KW genset;  
275 KW genset.

- e. The facilities are currently being utilized to provide current and future potable water service to the customers of FLWSC within the CCN. A portion of the facilities will be stranded if the area is transferred to Heath.

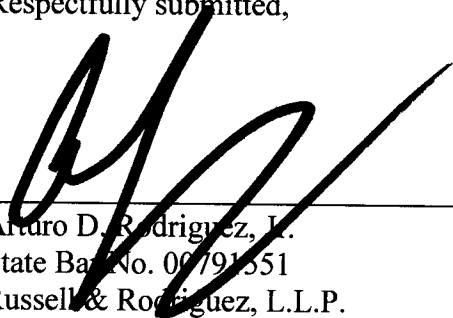
Response prepared by Eddy Daniel; sponsoring witness Eddy Daniel

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.

See Exhibit Heath RFI 1-2 indicating the FLWSC system facilities, previously provided. Additionally, see the documents provided in response to Heath RFI Exhibit 2-3. If single certification is granted for the areas shown on the previously provided Exhibit Heath RFI 1-3, a majority of the remaining undeveloped area located north of the county line will be developed and served by Heath. FLWSC will have capacity that will be stranded as the facilities have been constructed and dedicated in part to provide water to the undeveloped northern area.

Prepared by Eddy Daniel; sponsoring witness Eddy Daniel

Respectfully submitted,



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ATTORNEY FOR FORNEY LAKE WATER  
SUPPLY CORPORATION

**CERTIFICATE OF SERVICE**

I hereby certify that on the 2nd day of November, 2015, a true and correct copy of the foregoing document was served on all parties in accordance with PUJC Procedural Rule 22.74.

  
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Arturo D. Rodriguez, Jr.

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