



Control Number: 44621



Item Number: 26

Addendum StartPage: 0

DOCKET NO. 44621

RECEIVED

JOINT APPLICATION OF YES PREP §
PUBLIC SCHOOLS AND SUBURBAN §
UTILITY COMPANY TO DECERTIFY §
YES PREP PROPERTY FROM §
SUBURBAN WATER COMPANY'S §
CERTIFICATED SERVICE AREA §

2015 OCT 15 AM 10:35
PUBLIC UTILITY COMMISSION
FILING CLERK
OF TEXAS

**COMMISSION STAFF'S FIRST REQUEST FOR INFORMATION
TO YES PREP PUBLIC SCHOOLS
QUESTION NOS. STAFF 1-1 THROUGH STAFF 1-4**

Pursuant to Tex. Admin Code § 22.144 (TAC), the Staff of the Public Utility Commission of Texas (Staff) requests that the YES Prep Public Schools (YES Prep) by and through his attorney of record, provide the following information and answer the following question(s) under oath. The question(s) shall be answered in sufficient detail to fully present all of the relevant facts, within the time limit provided by the Presiding Officer or within 20 days, if the Presiding Officer has not provided a time limit. Please copy the question immediately above the answer to each question. These question(s) are continuing in nature, and if there is a relevant change in circumstances, submit an amended answer, under oath, as a supplement to your original answer. State the name of the witness in this cause who will sponsor the answer to the question and can vouch for the truth of the answer.

Provide an original and three copies of your answers to the questions to the Filing Clerk, Public Utility Commission of Texas, 1701 N. Congress Avenue, P.O. Box 13326, Austin, Texas 78711-3326.

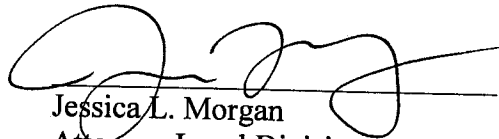
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Dated: October 15, 2015

Respectfully Submitted,

Margaret Uhlig Pemberton
Division Director-Legal Division

Karen S. Hubbard
Managing Attorney-Legal Division

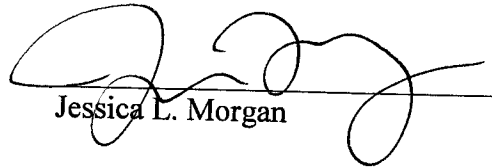


Jessica L. Morgan
Attorney-Legal Division
State Bar No. 24079023
(512) 936-7229
(512) 936-7268 (facsimile)
Public Utility Commission of Texas
1701 N. Congress Avenue
P.O. Box 13326
Austin, Texas 78711-3326

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CERTIFICATE OF SERVICE

I certify that a copy of this document will be served on all parties of record on October 15, 2015, in accordance with 16 TAC § 22.74.



Jessica L. Morgan

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**COMMISSION STAFF'S FIRST REQUEST FOR INFORMATION
TO YES PREP PUBLIC SCHOOLS
QUESTION NOS. STAFF 1-1 THROUGH STAFF 1-4**

DEFINITIONS

- A. "YES Prep," or "You," refers to YES Prep Public Schools and any person acting or purporting to act on his behalf, including without limitation, attorneys, agents, advisors, investigators, representatives, employees or other persons.

- B. "Document" includes any written, recorded, or graphic matter, however produced or reproduced, including but not limited to correspondence, telegrams, contracts, agreements, notes in any form, memoranda, diaries, voice recording tapes, microfilms, pictures, computer media, work papers, calendars, minutes of meetings or other writings or graphic matter, including copies containing marginal notes or variations of any of the foregoing, now or previously in your possession. In the event any documents requested by this Request for Information have been transferred beyond the Company's control, describe the circumstances under which the document was destroyed or transferred and provide an exact citation to the subject document. In the event that documents containing the exact information do not exist, but documents do exist which contain portions of the required information or which contain substantially similar information, then the definition of "documents" shall include the documents which do not exist and these documents will be provided.

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**COMMISSION STAFF'S FIRST REQUEST FOR INFORMATION
TO YES PREP PUBLIC SCHOOLS
QUESTION NOS. STAFF 1-1 THROUGH STAFF 1-4**

INSTRUCTIONS

- 1) Pursuant to 16 TAC § 22.144(c)(2), Staff requests that answers to the requests for information be made under oath.
- 2) Please copy the question immediately above the answer to each question. State the name of the witness in this cause who will sponsor the answer to the question and can vouch for the truth of the answer.
- 3) These questions are continuing in nature, and if there is a relevant change in circumstances, submit an amended answer, under oath, as a supplement to your original answer.
- 4) Words used in the plural shall also be taken to mean and include the singular. Words used in the singular shall also be taken to mean and include the plural.
- 5) The present tense shall be construed to include the past tense, and the past tense shall be construed to include the present tense.
- 6) If any document is withheld under any claim of privilege, please furnish a list identifying each document for which a privilege is claimed, together with the following information: date, sender, recipients or copies, subject matter of the document, and the basis upon which such privilege is claimed.
- 7) Pursuant to 16 TAC § 22.144(g)(4), if the response to any request is voluminous, please provide a detailed index of the voluminous material.
- 8) Staff requests that each item of information be made available as it is completed, rather than upon completion of all information requested.

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**COMMISSION STAFF'S FIRST REQUEST FOR INFORMATION
TO YES PREP PUBLIC SCHOOLS
QUESTION NOS. STAFF 1-1 THROUGH STAFF 1-4**

- Staff 1-1** Please provide a copy of a signed service agreement between YES Prep and Sunbelt FWSD that supports the continuance of service following the decertification of the specified area from Surburban's certificated area.
- Staff 1-2** Please provide a statement detailing any construction that would be necessary for the continuance of service following the decertification of the specified area from Surburban's certificated area.
- Staff 1-3** If construction is necessary to provide service to the proposed area for decertification, please provide copies of engineering plans related to the necessary construction.
- Staff 1-4** Please provide a general timeline that includes projected dates for the start of any construction, the completion of any construction, and the date in which Sunbelt would be able to begin water service at the YES Prep facility.