



Control Number: 44740



Item Number: 10

Addendum StartPage: 0

DOCKET NO. 44740

**APPLICATION MSEC ENTERPRISES,
INC. TO AMEND A CERTIFICATE OF
CONVENIENCE AND NECESSITY IN
MONTGOMERY COUNTY**

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**PUBLIC UTILITY COMMISSION
OF TEXAS**

27 AM 9:19
FILING CLERK

**COMMISSION STAFF'S FIRST REQUEST FOR INFORMATION TO
MSEC ENTERPRISES, INC.
QUESTION NOS. STAFF 1-1 THROUGH STAFF 1-3**

Pursuant to 16 TAC § 22.144 of the Commission's Procedural Rules, the Staff of the Public Utility Commission of Texas (Staff) requests that MSEC Enterprises, Inc. (Applicant) by and through its attorneys 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.

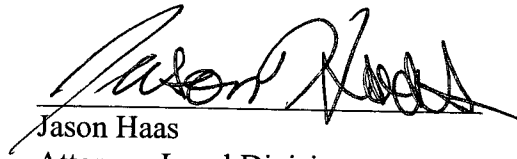
Provide an original and three copies of your answers to the questions to the Filing Clerk, Public Utility Commission of Texas, 1701 N. Congress Avenue, P.O. Box 13326, Austin, Texas 78711-3326.

Dated: August 27, 2015

Respectfully Submitted,

Margaret Uhlig Pemberton
Division Director-Legal Division

Karen S. Hubbard
Managing Attorney-Legal Division

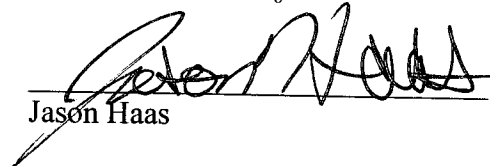


Handwritten signature of Jason Haas in black ink, written over a horizontal line.

Jason Haas
Attorney-Legal Division
State Bar No. 24032386
(512) 936-7295
(512) 936-7268 (facsimile)
Public Utility Commission of Texas
1701 N. Congress Avenue
P.O. Box 13326
Austin, Texas 78711-3326

CERTIFICATE OF SERVICE

I certify that a copy of this document will be served on all parties of record on August 27, 2015 in accordance with Public Utility Commission of 16 TAC § 22.74.



Handwritten signature of Jason Haas in black ink, written over a horizontal line.

Jason Haas

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**COMMISSION STAFF'S FIRST REQUEST FOR INFORMATION TO
MSEC ENTERPRISES, INC.
QUESTION NOS. STAFF 1-1 THROUGH STAFF 1-3**

DEFINITIONS

- A. **“Applicant, “the Company” or “you”** refers to the MSEC Enterprises, Inc. and any person acting or purporting to act on their 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
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QUESTION NOS. STAFF 1-1 THROUGH STAFF 1-3**

INSTRUCTIONS

- 1) Pursuant to P.U.C. Proc. R. 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 P.U.C. Proc. R. 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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- Staff 1-1 Please provide all information on the costs for constructing, operating, and maintaining the system and the revenue amount that will be generated from the Montgomery Independent School District to pay for the new system, along with projected profit and loss statements, cash flow worksheets, and balance sheets for each of the first five years of operation.
- Staff 1-2 Please provide approval documentation of the wastewater permit submitted to the Texas Commission on Environmental Quality.
- Staff 1-3 Please provide written consent from Lonestar GCD and the SJRA pursuant to Texas Water Code § 13.244(c) and 16 Tex. Admin Code § 24.105(a)(4).