



Control Number: 45253



Item Number: 52

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DOCKET NO. 45253

**APPLICATION OF WOODLAND HILLS §
WATER LLC TO AMEND A WATER §
CERTIFICATE OF CONVENIENCE AND §
NECESSITY IN LIBERTY AND §
MONTGOMERY COUNTIES §**

PUBLIC UTILITY COMMISSION

OF TEXAS

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**COMMISSION STAFF'S SEVENTH REQUEST FOR
INFORMATION TO WOODLAND HILLS
WATER LLC (WOODLAND HILLS)
QUESTION NOS. STAFF 7-1 THROUGH 7-5**

Pursuant to 16 Tex. Admin. Code (TAC) § 22.144, the Staff of the Public Utility Commission of Texas (Staff) requests that Woodland Hills 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.

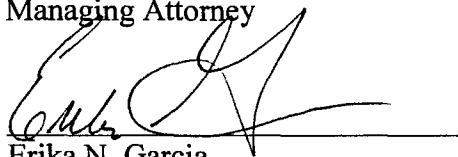
Dated: July 10, 2017

Respectfully Submitted,

**PUBLIC UTILITY COMMISSION OF TEXAS
LEGAL DIVISION**

Margaret Uhlig Pemberton
Division Director

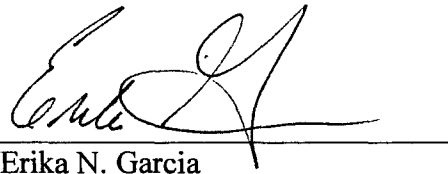
Karen S. Hubbard
Managing Attorney



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CERTIFICATE OF SERVICE

I certify that a copy of this document will be served on all parties of record on July-10, 2017 in accordance with 16 TAC § 22.74.



Erika N. Garcia

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**COMMISSION STAFF'S SEVENTH REQUEST FOR
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WATER LLC (WOODLAND HILLS)
QUESTION NOS. STAFF 7-1 THROUGH 7-5**

DEFINITIONS

- 1) "Woodland Hills", "the Company" or "you" refers to Woodland Hills Water, LLC and any person acting or purporting to act on their behalf, including without limitation, attorneys, agents, advisors, investigators, representatives, employees or other persons.
- 2) "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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INFORMATION TO WOODLAND HILLS
WATER LLC (WOODLAND HILLS)
QUESTION NOS. STAFF 7-1 THROUGH 7-5**

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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- Staff 7-1 Please provide a list of the new production, storage, service pump(s), pressure tank(s) and/or elevated storage tank(s) capacities that will be installed in any of the public water systems owned by Woodland Hills Water LLC within the next 5 years along with estimated costs, funding sources, amortization schedule for debt incurred, and timelines for the new equipment installation.
- Staff 7-2 Please provide the date of the last TCEQ water system inspections as requested in Section 5(A)(iii).
- Staff 7-3 Please provide a copy of the most recent TCEQ water and/or sewer inspection report letters as requested in Section 5(A)(iv).
- Staff 7-4 Please provide a brief explanation listing the actions taken or being taken by the utility to correct the listed deficiencies, including the proposed completion dates for each system deficiency listed in the TCEQ inspection report letter referred to in Section 5(A)(iii) as requested in Section 5(A)(v).
- Staff 7-5 Please provide explanations on how the following violations will be addressed:

PWS ID	1460101	MEADOW GLEN CRYSTAL SPRINGS WATER	
NOV Date	Status	Citation/Requirement Provision	Allegation
6/27/2017	ACTIVE	30 TAC Chapter 290, SubChapter D 290.41(c)(1)(F) (Not applicable to CH)	Failure by Meadow Glen Crystal Springs WS to maintain a sanitary control easement for all land within 150 feet of each well.

PWS ID	1460093	WOODRIDGE PARK SUBDIVISION WS	
NOV Date	Status	Citation/Requirement Provision	Allegation
3/2/2017	ACTIVE	30 TAC Chapter 290, SubChapter D 290.39(j) (Not applicable to CH)	Failure to notify the executive director prior to making any significant change or addition to the system's production, treatment, storage, pressure maintenance, or distribution facilities.