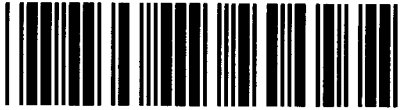


Control Number: 45253



Item Number: 9

Addendum StartPage: 0

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

2016 JAN 11 AM 11:42

FILING CLERK

**COMMISSION STAFF'S FIRST REQUEST FOR  
INFORMATION TO WOODLAND HILLS  
WATER LLC (WOODLAND HILLS)  
QUESTION NOS. STAFF 1-1 THROUGH 1-6**

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.

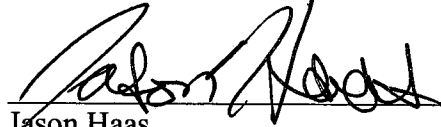
Provide an original and three copies of your answers to the questions to the Filing Clerk, Public Utility Commission of Texas, 1701 N. Congress Avenue, P.O. Box 13326, Austin, Texas 78711-3326.

Dated: January 11, 2016

Respectfully Submitted,

Margaret Uhlig Pemberton  
Division Director-Legal Division


Karen S. Hubbard  
Managing Attorney-Legal Division

A handwritten signature in black ink, appearing to read "Jason Haas", 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 January 11, 2016 in accordance with 16 TAC § 22.74.

A handwritten signature in black ink, appearing to read "Jason Haas", written over a horizontal line.

Jason Haas

**DOCKET NO. 45253**

**COMMISSION STAFF'S FIRST REQUEST FOR  
INFORMATION TO WOODLAND HILLS  
WATER LLC (WOODLAND HILLS)  
QUESTION NOS. STAFF 1-1 THROUGH 1-6**

**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.

**DOCKET NO. 45253**

**COMMISSION STAFF'S FIRST REQUEST FOR  
INFORMATION TO WOODLAND HILLS  
WATER LLC (WOODLAND HILLS)  
QUESTION NOS. STAFF 1-1 THROUGH 1-6**

**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.

**DOCKET NO. 45253**

**COMMISSION STAFF'S FIRST REQUEST FOR  
INFORMATION TO WOODLAND HILLS  
WATER LLC (WOODLAND HILLS)  
QUESTION NOS. STAFF 1-1 THROUGH 1-6**

- Staff 1-1      Please state whether Woodland Hills Water, LLC plans to develop or is aware of any development in the requested service area within the next 5 years. Please include any projections for development within the requested service area within the next five years.
- Staff 1-2:      Please state whether Woodland Hills Water, LLC plans to serve the requested service area's future customers within the next 5 years.
- Staff 1-3      Provide projections covering the next 5 years that specifically address the number **AND** type of customers/connections **AND** size of connections, i.e., 1-10 residential 5/8" x 3/4" connections or approximately 100 residential 5/8" x 3/4" connections and 5 commercial 3/4" connections that Woodland Hills Water LLC anticipates in the requested service area in the next five years.
- Staff 1-4      Provide projected cost per connection in relation to RFI – 2 and RFI – 3 for the next five years.
- Staff 1-5:      Provide projected time frames for construction of the new utility system over the next 5 years that is needed to serve the area (695.9701 acres) to be developed, as applicable and/or projected time frames for construction to add onto or renovate existing facilities over the next 5 years to serve the area (695.9701 acres) to be developed, as applicable.
- Staff 1-6      Provide a detailed explanation of how the new facilities, additions, and/or renovations will be funded. Include any bank balances reserved, future income designations, other financial assurance, etc. for each of the following:
- A.) New utility facilities to serve the requested service area.
  - B.) Additions and renovations to existing utility facilities to serve the requested service area.