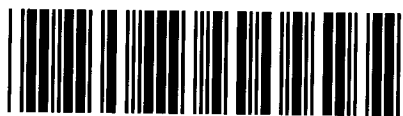




Control Number: 45510



Item Number: 20

Addendum StartPage: 0

DOCKET NO. 45510

**APPLICATION OF HOE WATER
SUPPLY CORPORATION AND
HARRIS COUNTY MUD NO. 480 FOR
SALE, TRANSFER, OR MERGER OF
CERTIFICATE RIGHTS IN HARRIS
COUNTY (37986-S)**

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PUBLIC UTILITY COMMISSION

OF TEXAS

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**COMMISSION STAFF'S SECOND REQUEST FOR INFORMATION
TO HOE WATER SUPPLY CORPORATION AND HARRIS COUNTY MUD NO. 480
QUESTION NOS. STAFF 2-1 THROUGH STAFF 2-4**

Pursuant to Tex. Admin Code § 22.144 (TAC), the Staff of the Public Utility Commission of Texas (Staff) requests that the H.O.E. Water Supply Corporation and Harris County MUD No. 480 (jointly "Applicants") 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.

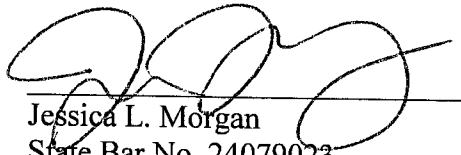
Dated: July 19, 2016

Respectfully Submitted,

**PUBLIC UTILITY COMMISSION OF TEXAS
LEGAL DIVISION**

Margaret Uhlig Pemberton
Division Director

Karen S. Hubbard
Managing Attorney

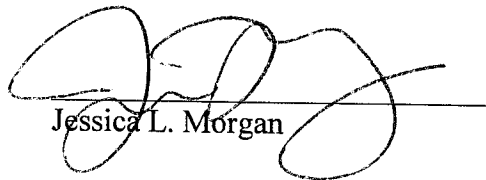


Jessica L. Morgan
State Bar No. 24079023
1701 N. Congress Avenue
P.O. Box 13326
Austin, Texas 7871-3326
(512) 937-7229
(512) 937-7268 (facsimile)

DOCKET NO. 45510

CERTIFICATE OF SERVICE

I certify that a copy of this document will be served on all parties of record on July 19, 2016, in accordance with 16 TAC § 22.74.



Jessica L. Morgan

DOCKET NO. 45510

**COMMISSION STAFF'S SECOND REQUEST FOR INFORMATION
TO HOE WATER SUPPLY CORPORATION AND HARRIS COUNTY MUD NO. 480
QUESTION NOS. STAFF 2-1 THROUGH STAFF 2-4**

DEFINITIONS

- A. "Applicants," or "You" refers to H.O.E. Water Supply Corporation and Harris County MUD No. 480 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.

DOCKET NO. 45510

**COMMISSION STAFF'S SECOND REQUEST FOR INFORMATION
TO HOE WATER SUPPLY CORPORATION AND HARRIS COUNTY MUD NO. 480
QUESTION NOS. STAFF 2-1 THROUGH STAFF 2-4**

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.

DOCKET NO. 45510

**COMMISSION STAFF'S SECOND REQUEST FOR INFORMATION
TO HOE WATER SUPPLY CORPORATION AND HARRIS COUNTY MUD NO. 480
QUESTION NOS. STAFF 2-1 THROUGH STAFF 2-4**

- Staff 2-1** Please provide copies of a five-year projected Statement of Net Position/Balance Sheet and Statement of Activities/Income Statement for the Harris County MUD No. 480.
- Staff 2-2** Please provide a copy of the 2015 financial statements, including a balance sheet and income statement of John N. Taylor.
- Staff 2-3** Please provide other financial documents or financial assurance from John N. Taylor to demonstrate the financial capability of the developer to finance future improvements, operations, repairs, and maintenance expenses.
- Staff 2-4** Please refer to the Applicants' response to Staff RFI 1-1, page 7-8 of the audited financial reports of Harris County MUD No. 480. Please provide detailed information on the "Due to Developers" in the amount of \$5,224,515. Please include in the response, information detailing the identity of the developers and the terms of the agreement pursuant to which the "Due to Developers" amount will be paid.