

Control Number: 45639



Item Number: 19

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APPLICATION OF MITCHELL
COUNTY UTILITY COMPANY AND
CORIX UTILITIES (TEXAS) INC.
FOR SALE, TRANSFER, OR
MERGER OF FACILITIES AND
CERTIFICATE RIGHTS IN
MITCHELL COUNTY

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PUBLIC UTILITY COMMISSION
OF TEXAS

**CORIX UTILITIES (TEXAS) INC.'S RESPONSE TO COMMISSION STAFF'S FIRST
REQUEST FOR INFORMATION
QUESTION NOS. 1-1 THROUGH 1-2**

Corix Utilities (Texas) Inc. ("CUTX") files this Response to Commission Staff's ("Staff") First Request for Information Question Nos. 1-1 through 1-2.

I. WRITTEN RESPONSES

CUTX's supplemental written responses to Staff's First Request for Information are attached and incorporated by reference. Each response is stated on or attached to a separate page on which the request has been restated. CUTX's responses are made in the spirit of cooperation without waiving CUTX's right to contest the admissibility of any of these matters at hearing. Pursuant to P.U.C. PROC. R. 22.144(c)(2)(A), each response lists the preparer or person under whose direct supervision the response was prepared and any sponsoring witness. When CUTX provides certain information sought by the request while objecting to the provision of other information, it does so without prejudice to its objection in the interests of narrowing discovery disputes pursuant to P.U.C. PROC. R. 22.144(d)(5). Pursuant to P.U.C. PROC. R. 22.144(c)(2)(F), CUTX stipulates that its responses may be treated by all parties as if they were made under oath.

II. INSPECTIONS.

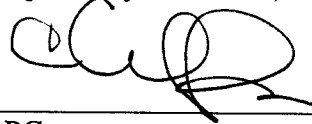
If responsive documents are more than 100 pages but less than eight linear feet in length, the response will indicate that the attachment is VOLUMINOUS and, pursuant to P.U.C. PROC. R. 22.144(h)(2), the attachment will be made available for inspection at CUTX's voluminous room at 401 Congress Avenue, Suite 2100, Austin, Texas 78701; telephone number (512) 370-2868. In addition, CUTX will provide voluminous exhibits to all parties on CD. If a response or the responsive documents are provided pursuant to the protective order in this docket, the response will indicate that it or the attachment is either CONFIDENTIAL or HIGHLY SENSITIVE as appropriate under the protective order. Confidential and Highly Sensitive

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responsive documents will be made available for inspection at CUTX's voluminous room, unless they form a part of a response that exceeds eight linear feet in length; then they will be available at their usual repository in accordance with the following paragraph. Please call in advance for an appointment to ensure that there is sufficient space to accommodate your inspection.

If responsive documents exceed eight linear feet in length, the response will indicate that the attachment is subject to the FREIGHT CAR DOCTRINE, and, pursuant to P.U.C. PROC. R. 22.144(h)(3), the attachment will be available for inspection at CUTX's offices in Austin, Texas, unless otherwise indicated. CUTX requests that parties wishing to inspect this material provide at least 48 hours' notice of their intent by contacting Carrie Collier-Brown of Winstead, PC, 401 Congress Avenue, Suite 2100, Austin, Texas 78701; telephone number (512) 370-2868; facsimile transmission number (512) 370-2850; email address ccbrown@winstead.com. Inspections will be scheduled to accommodate all requests with as little inconvenience to the requesting party and to CUTX's operations as possible.

Respectfully submitted,



WINSTEAD PC

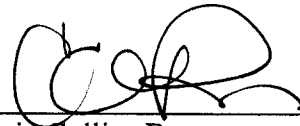
R. Darrin Barker
General Manager
Corix Utilities (Texas) Inc.
1812 Centre Creek Drive, Suite 207
Austin, Texas 78754
(512) 306-4000
Darrin.barker@corix.com

Derek Seal
State Bar No. 00797404
Carrie Collier-Brown
State Bar No. 24065064
401 Congress Avenue, Suite 2100
Austin, Texas 78701
(512) 370-2800
(512) 370-2850 facsimile
dseal@winstead.com
ccbrown@winstead.com

ATTORNEYS FOR CORIX UTILITIES (TEXAS) INC.

CERTIFICATE OF SERVICE

I certify that a copy of the foregoing document will be served on all parties of record on the 28th day of April, 2016, in accordance with P.U.C. PROC. R. 22.74.



Carrie Collier-Brown

RESPONSES

QUESTION NO. Staff 1-1:

Provide copies of the construction and use approval letters from the TCEQ to Mitchell County Utility Company regarding Mitchell County Utility Company's five (5) wells.

RESPONSE:

On March 18, 2016, CUTX filed a Supplement to the Application Regarding Water Supply ("Supplement") that includes an affidavit providing information about the five (5) wells. *See* Docket No. 45639, Item No. 13 on the Commission's Interchange. Also included with the Supplement are a September 14, 1999 approval letter from TCEQ's predecessor agency for three of the five (5) wells, and two approval letters from TCEQ dated January 23, 2007 and August 14, 2009 for interim approval for the remaining two (2) wells. CUTX has been informed by TCEQ staff that the letters from TCEQ for interim approval for two (2) of the wells are the only approval letters issued by TCEQ for the two (2) wells, and that all five (5) wells have been approved by TCEQ as indicated by the aforementioned letters.

Preparers: R. Darrin Barker
Sponsors: R. Darrin Barker
Gloria Broussard

QUESTION NO. Staff 1-2:

Provide a copy of the approval letter from the TCEQ to Mitchell County Utility Company for the as-built hydro pneumatic tank that was disapproved for use by the TCEQ on July 7, 2011. If the TCEQ did not issue an approval letter, state the status of the as-built hydro pneumatic tank.

RESPONSE:

For clarification, the July 7, 2011 letter from TCEQ does not indicate that TCEQ disapproved the hydropneumatic tank, but rather requested information to facilitate TCEQ's approval of the hydropneumatic tank. MCUC is working to provide the information necessary for TCEQ to review and approve the hydropneumatic tank, although TCEQ has to date not issued an approval letter. CUTX will provide a TCEQ approval letter when it is received.

Preparers: R. Darrin Barker

Sponsor: R. Darrin Barker