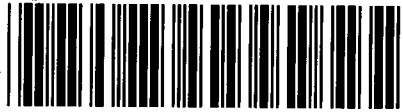




Control Number: 45702



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Addendum StartPage: 0

SOAH DOCKET NO. 473-16-5296.WS
PUC DOCKET NO. 45702

RECEIVED

APPLICATION OF THE CITY OF
CIBOLO FOR SINGLE CERTIFICATION
IN INCORPORATED AREA AND TO
DECERTIFY PORTIONS OF GREEN
VALLEY SPECIAL UTILITY
DISTRICT'S SEWER CERTIFICATE OF
CONVENIENCE AND NECESSITY IN
GUADALUPE COUNTY

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BEFORE THE PUBLIC UTILITY COMMISSION

PUBLIC UTILITY COMMISSION
FILING CLERK

COMMISSION OF TEXAS

GREEN VALLEY SUD'S SECOND SUPPLEMENTAL RESPONSE TO CIBOLO'S
FOURTH REQUEST FOR INFORMATION

To: City of Cibolo, Texas, by and through its attorneys of record, David Klein and Christie Dickenson, Lloyd Gosselink, 816 Congress Ave., Suite 1900, Austin, Texas 78701.

Green Valley Special Utility District ("Green Valley SUD") herein provides its Second Supplemental Response to City of Cibolo's Fourth Request for Information to Green Valley SUD. Green Valley SUD stipulates that the following responses to requests for information may be treated by all parties as if the answer was filed under oath.

Respectfully submitted,

By: 

Paul M. Terrill III
State Bar No. 00785094
Geoffrey P. Kirshbaum
State Bar No. 24029665
Shan S. Rutherford
State Bar No. 24002880
TERRILL & WALDROP
810 W. 10th Street
Austin, Texas 78701
(512) 474-9100
(512) 474-9888 (fax)

ATTORNEYS FOR GREEN VALLEY SPECIAL UTILITY
DISTRICT

CERTIFICATE OF SERVICE

I hereby CERTIFY that on December 15, 2016, a true and complete copy of the above was sent by the method indicated to counsel of record at the following addresses in accordance with P.U.C. PROC. R. 22.74:

David Klein
Christie Dickenson
Lloyd Gosselink
816 Congress Ave., Suite 1900
Austin, Texas 78701

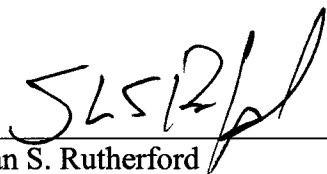
via fax to: (512) 472-0532

ATTORNEY FOR APPLICANT

Landon Lill
Public Utility Commission of Texas
1701 N Congress PO Box 13326
Austin, Texas 78711-3326

via fax to: (512) 936-7268

ATTORNEY FOR COMMISSION STAFF


Shan S. Rutherford

RESPONSE TO REQUEST FOR INFORMATION

Cibolo RFI 4-9

Please identify the specific portion(s) of the Woods of St. Claire Subdivision Water Service Feasibility Study that you contend would be rendered useless or valueless by decertification of the service area colored in light blue in Attachment 1 to these Requests.

RESPONSE:

GVSUD contends that its appraisal filed at the PUC on June 28, 2016 includes all real and personal property of GVSUD that would be rendered useless or valueless by the decertification as of the date of the Appraisal. Values identified in the appraisal will need to be updated as part of the second phase of this hearing.

GVSUD's appraisal does not include any dollars associated with GVSUD's Woods of St. Claire Subdivision Water Service Feasibility Study. This study examined the feasibility of water service to this subdivision, but subsequent units of this development will require retail public wastewater utility service from GVSUD. The Feasibility Study was provided to Mr. Korman to demonstrate that GVSUD's investments and steps taken to implement a wastewater system in its CCN area were made to meet the need for sewer service in GVSUD's CCN area. GVSUD witness Josh Korman used the Feasibility Study as a data point when performing GVSUD's appraisal.

Prepared and Sponsored by: Pat Allen, General Manager - Green Valley Special Utility District