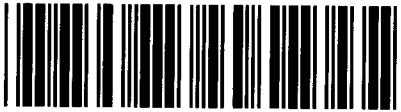


Control Number: 45702



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APPLICATION OF THE CITY OF §
CIBOLO FOR SINGLE CERTIFICATION §
IN INCORPORATED AREA AND TO §
DECERTIFY PORTIONS OF GREEN §
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DISTRICT'S SEWER CERTIFICATE OF §
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GUADALUPE COUNTY §

BEFORE THE PUBLIC UTILITY

2016 JUN 20 PM 2:37
PUBLIC UTILITY COMMISSION
FILING CLERK

COMMISSION OF TEXAS

**GREEN VALLEY SUD'S RESPONSE TO CIBOLO'S FIRST REQUESTS FOR
ADMISSION AND REQUESTS 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") provides its response to City of Cibolo's First Requests for Admission and Requests for Information to Green Valley SUD. Green Valley SUD stipulates that the following response 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
TERRILL & WALDROP
810 W. 10th Street
Austin, Texas 78701
(512) 474-9100
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**ATTORNEYS FOR GREEN VALLEY SPECIAL UTILITY
DISTRICT**

RESPONSE TO REQUESTS FOR ADMISSION

Cibolo RFA 1-1 Admit that on March 8, 2016, GVSUD had no existing retail sewer customers within the boundaries of its sewer CCN No. 20973.

RESPONSE: Admit

Cibolo RFA 1-2 Admit that on March 8, 2016, GVSUD had no existing sewer infrastructure within the boundaries of its sewer CCN No. 20973.

RESPONSE: Deny

Cibolo RFA 1-3 Admit that on March 8, 2016, GVSUD had no existing retail sewer customers within the area colored in light blue in Attachment A to the City's Application, which is attached hereto as Attachment 1.

RESPONSE: Admit

Cibolo RFA 1-4 Admit that on March 8, 2016, GVSUD had no existing sewer infrastructure within the area colored in light blue in Attachment 1.

RESPONSE: Admit

Cibolo RFA 1-5 Admit that on March 8, 2016, GVSUD had not entered into any agreement regarding the design or construction of sewer infrastructure within the boundaries of its sewer CCN No. 20973.

RESPONSE: Deny

Cibolo RFA 1-6 Admit that on March 8, 2016, GVSUD did not have any existing loans or other debt obligations relating to the design or construction of sewer infrastructure.

RESPONSE: Deny

Cibolo RFA 1-7 Admit that between August 18, 2015 and May 30, 2016, GVSUD did not receive any requests for retail sewer service from landowners within the are colored light blue in Attachment 1.

RESPONSE TO REQUEST FOR INFORMATION

Cibolo RFI 1-1 If any of GVSUD's property may be rendered useless or valueless by single sewer certification as requested by the City, please identify such property.

RESPONSE: GVSUD has retained a qualified independent appraiser to investigate, identify, and value GVSUD's property that will be rendered useless or valueless by Cibolo's requested single certification as described in this request. The appraiser has not completed his appraisal report yet, but it will be filed with the PUC on June 28, 2016 as agreed with Cibolo. GVSUD intends for that report to provide information responsive to this request, but GVSUD does not have this information at this time.

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

Cibolo RFI 1-2 Please provide GVSUD's most recent planning, engineering, or other reports that describe GVSUD's current sewer system and any proposed changes.

RESPONSE: Please see GVSUD 000001-947 and GVSUD 0002352-2551.

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

Cibolo RFI 1-3 Please provide a map of GVSUD's sewer system indicating the parts of the system within the area colored light blue in Attachment 1.

RESPONSE: Please see GVSUD 000001-731 and GVSUD 000877-947.

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

Cibolo RFI 1-4 Please provide the total gallons of raw wastewater treated by GVSUD, by month, for the full calendar years of 2014 and 2015, and for the partial calendar year of January-April 2016.

RESPONSE: 0 gallons.

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

Cibolo RFI 1-5 Please provide the total gallons treated by GVSUD, by month, for retail sewer customers within the area colored light blue in Attachment 1 for the

Cibolo RFI 1-10

Please provide a detailed asset listing of GVSUD's sewer facilities within the area colored in light blue in Attachment 1, as well as the assets that support the identified wastewater facilities (including lift stations, interceptors, etc.), that includes:

- A description and the location of facilities in GVSUD's system
- Original or purchase cost
- Capacity
- Date placed in service
- To the extent known the financing vehicles used to purchase the wastewater facilities

RESPONSE:

1. Description of the location of facilities on GVSUD's system:

GVSUD purchased approximately 65 acres to construct a regional treatment facility. The discharge location is at 3930 Linne Road, Seguin, Guadalupe County, Texas 78155.

2. Original or purchase cost:

The property was purchased for \$ 325,000.00.

3. Capacity: As described in the approved draft permit from the Texas Commission on Environmental Quality (TCEQ).

The applicant has applied to the Texas Commission on Environmental Quality (TCEQ) for a new permit to authorize the discharge of treated domestic wastewater at an annual average flow not to exceed 0.25 million gallons per day (MGD) in the Interim I phase, an annual average flow not to exceed 2.5 MGD in the Interim II phase, and an annual average flow not to exceed 5.0 MGD in the Final phase. The proposed wastewater treatment facility will serve proposed developments within the District's Certified Wastewater service area.

4. Date Placed in Service:

Facility construction to begin pending final permit approval from TCEQ.

5. Financing Vehicles:

For completion of its wastewater impact projects, GVSUD is considering financing from the Texas Water Development Board, United States Department of Agriculture Rural Development, and GVSUD selling Bonds pending TCEQ Bond application

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

Cibolo RFI 1-15 Please provide a copy of GVSUD's most recent sewer cost of service and rate design study.

RESPONSE: After a diligent search, GVSUD has not identified any documents responsive June 20, 2016 to this request. GVSUD has not yet prepared such a study. However, GVSUD plans to do so as appropriate before setting its retail sewer rates.

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

Cibolo RFI 1-16 Please provide a copy of GVSUD's current wastewater or sewer system master plan and/or capital improvement plan.

RESPONSE: Please see GVSUD 000001-731.

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

Cibolo RFI 1-17 Please provide a copy of GVSUD's 2014 and 2015 audited financials. If audited financials are not available, please provide internal financials.

RESPONSE: Please see GVSUD 002256- 2351.

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

Cibolo RFI 1-18 Please provide a copy of GVSUD's approved budget for its current and previous fiscal year.

RESPONSE: Please see GVSUD 002200-2207.

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

Cibolo RFI 1-19 Please provide GVSUD's budget vs. actual, by line-item, for its prior fiscal year.

Cibolo RFI 1-23 If your answer to Cibolo RFA 1-1 is “deny,” please provide any documentation in your possession that provides a basis for your answer.

RESPONSE: Not applicable

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

Cibolo RFI 1-24 If your answer to Cibolo RFA 1-2 is “deny,” please provide any documentation in your possession that provides a basis for your answer.

RESPONSE: Please see GVSUD 000001-731; GVSUD 000732-834; GVSUD 001229-1256; GVSUD 002532-2511.

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

Cibolo RFI 1-25 If your answer to Cibolo RFA 1-3 is “deny,” please provide any documentation in your possession that provides a basis for your answer.

RESPONSE: Not applicable.

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

Cibolo RFI 1-26 If your answer to Cibolo RFA 1-4 is “deny,” please provide any documentation in your possession that provides a basis for your answer.

RESPONSE: Not applicable.

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

Cibolo RFI 1-27 If your answer to Cibolo RFA 1-5 is “deny,” please provide any documentation in your possession that provides a basis for your answer.

RESPONSE: Please see GVSUD 001229-1256 and GVSUD 001979-1981.

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

DOCKET NO. 45702

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**GREEN VALLEY SPECIAL UTILITY DISTRICT'S
BATES NUMBER LOG**

Document #	Description	Responsive to
GVUSD 000001-731	Green Valley Special Utility District's Wastewater Master Plan	2, 3, 16, 24
GVSUD 000732-834	GVSUD's Application for a TPDES Permit	2, 13, 24
GVUSD 000835-860	November 12, 2015 City of Cibolo's Formal Comments on TPDES Application	2
GVSUD 000861-876	Notice of Application and Preliminary Decision for TPDES Permit	2, 10, 13, 22
GVSUD 000877-947	Draft TPDES Permit from TCEQ	2, 3, 10, 13, 22
GVSUD 000948-1196	USDA Loan Documents - \$584,000 Green Valley Special Utility District Revenue Bonds Series 2003	9, 28
GVSUD 001197-1225	CCN Area Maps and Metes and Bounds for Green Valley Special Utility District	12
GVSUD 001226-1228	Interlocal Agreement between the City of Marion and Green Valley Special Utility District	
GVSUD 001229-1237	Unimproved Property Contract - 65 acres on Linne Road	13, 24, 27
GVSUD 001238-1240	Payment for 65 acres	13, 24, 27
GVSUD 001241	Resolution of Green Valley Special Utility District's Board of Directors regarding purchase of 65 acres	13, 24, 27

GVSUD 002512-2551	Green Valley Special Utility District's Planning Documents - Cost Estimates, Quantity Summaries, and Schematics and Plans for Proposed Wastewater Treatment Plant	2
GVSUD 002552-2592	Green Valley Special Utility District's By-laws and Operating Procedures	30
GVSUD 002593	Sewer CCN	10, 13
GVSUD 002594-2597	Various correspondence with TWDB and USDA	20
GVSUD 002598-2606	May 18, 2015 Admin Complete Letter from the TCEQ	10, 13
GVSUD 002607-2609	Green Valley Special Utility District's Ledger of Wastewater Expenses to Date	

OVERSIZED DOCUMENT

CD ATTACHED

**TO VIEW OVERSIZED
DOCUMENT PLEASE CONTACT
CENTRAL RECORDS
512-936-7180**