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

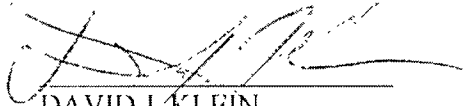
**CITY OF CIBOLO'S SECOND REQUESTS FOR ADMISSION TO
GREEN VALLEY SPECIAL UTILITY DISTRICT**

Pursuant to 16 Tex. Admin. Code ("TAC") § 22.144, comes now the City of Cibolo (the "City"), by and through its undersigned attorneys of records, and files its Second Requests for Admission to Green Valley Special Utility District ("GVSUD" or "District").

Respectfully submitted,

**LLOYD GOSSELINK ROCHELLE &
TOWNSEND, P.C.**

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ATTORNEYS FOR CITY OF CIBOLO

CERTIFICATE OF SERVICE

I hereby certify that a true and correct copy of the foregoing document was transmitted by fax, hand-delivery and/or regular, first class mail on this 20th day of September, 2016 to the parties of record.


David J. Klein

INSTRUCTIONS

The following paragraphs include instructions and definitions that apply to the requests for admission that are contained in this discovery request. Unless otherwise clearly indicated within the context of a specific interrogatory herein, the definition of each term provided below applies whether the term is used or defined in the singular or plural.

You are directed to answer the following written questions fully and in writing, based on all information reasonably available to you or your attorney at the time your response is made.

You are under a continuing duty to supplement your answers if you discover that they were incomplete or incorrect when made, or if you discover that they are no longer complete and correct. Supplementation must be made reasonably promptly after you discover the need for supplementation.

DEFINITIONS

1. **"You" and "Your"** refers to Green Valley Special Utility District named as a Party in PUC Docket No. 45702.
2. **"Green Valley Special Utility District" or "GVSUD"** refers to its officers, employees, agents, representatives, attorneys, and all other natural persons, businesses or legal entities, presently or formerly, acting in concert with, under the direct or indirect control of, or on behalf of GVSUD.
3. **"City" or "Cibolo"** refers to the City of Cibolo, Texas; its officers, employees, agents, representatives, attorneys, and all other natural persons, businesses or legal entities, presently or formerly, acting in concert with, under the direct or indirect control of, or on behalf of the Cibolo.
4. The term **"Commission" or "PUC"** refers to the Public Utility Commission of Texas, an administrative agency of the State of Texas, and its Staff and Commissioners, natural persons employed by and working for the agency.
5. The term **"Staff"** as used herein refers to the natural persons employed by and working for the Public Utility Commission in any capacity.
6. The term **"TCEQ"** as used herein refers to the Texas Commission on Environmental Quality, an administrative agency of the State of Texas, and its staff and commissioners, natural persons employed by and working for the agency.
7. The term **"Application"** as used herein refers to the City's Application to Obtain or Amend a Certificate of Convenience and Necessity Under Water Code Section 13.255 filed with the Commission on March 8, 2016.

8. The term “CCN” as used herein refers to a certificate of public convenience and necessity to provide retail water or sewer service issued by the Commission or a predecessor agency.
9. “**Document**” and “**Documents**” are used herein in their broadcast sense as set forth in Tex. R. Civ. P. 192.3(b), and specifically include electronic information or magnetic data as described in Rule 196.4. These words mean and include all written, printed, typed, recorded, or graphic matter of every kind and description, both original and copies, and all attachments and appendices. Without limiting the foregoing, the terms “Document” and “Documents” shall include all agreements, contracts, Communications, correspondence, letters, opinion letters, telegrams, telexes, telefaxes, messages, memoranda, records, reports, books, summaries or other records of telephone conversations or interviews, summaries or other records of personal conversations or interviews, minutes, summaries, or other records of meetings and conferences, statements obtained from witnesses, summaries or other records of negotiations, other summaries, diaries, diary entries, calendars, appointment books, time records, instructions, work assignments, forecasts, progress reports, statistical data, statistical statements, financial statements, work sheets, work papers, drafts, graphs, charts, tables, accounts, analytical records, consultants’ and experts’ reports, appraisals, bulletins, notes, notices, marginal notations, notebooks, telephone records, bills, statements, records of obligation and expenditure, invoices, lists, journals, printouts, compilations, tabulations, analyses, studies, surveys, expense reports, microfilm, microfiche, tape or disc recordings, sound recordings, video recordings, film, tape, photographs, programs and data compilations from which information can be obtained (including matter used in data processing), and other printed, written, handwritten, typewritten, recorded, stenographic, computer-generated, computer stored, magnetically-stored, optically-stored, or electronically stored matter and Electronic Information, however produced, prepared, reproduced, disseminated, made or stored in any data source. The words “Document” and “Documents” also include all copies of documents by whatever means made, except that where a document is produced, identical copies of it that do not contain any markings, additions, or deletions that are different from the original do not have to be separately produced.
10. The term “**communication**” includes, without limitation of its generality, statements, discussions, conversations, speeches, meetings, remarks, questions, answers, panel discussions and symposia, whether written or oral. The term includes, without limitation of its generality, both communications and statements which are face-to-face and those which are transmitted by any media such as intercoms, telephones, television, radio, or computer including electronic information.
11. The term “**electronic information**” includes, without limitation, the following: databases, data files, program files (e.g. .DOC, .DOCX, .TXT, .XLS, .WPD files), image files (e.g. .JPEG, .TIFF, .PDF files), email messages and files, voice mail messages and files, instant messaging messages, text messages, temporary files, system-history files, deleted files or emails, back up files and archival files, website files, website information stored in textual, graphical or audio format, cache files, and cookies.
12. The term “**data sources**” includes, without limitation, mainframe computers, network servers, internet (“web”) servers, computers (including desktop, laptop and handheld

computers), hard drives (including portable or temporary hard drives), flash drives (including thumb drives, secure digital cards or other flash memory devices), email servers, handheld devices like personal digital assistants and cell phones or smart phones (e.g. iPhones, BlackBerrys).

13. The terms **“relate”** or **“relating”** or **“regarding”** to any given subject, when used to specify a document, communication, statement, or correspondence mean any document, communication, statement or correspondence that constitutes, contains, evidences, embodies, reflects, identifies, states, discusses, refers to, deals with, or is in any manner whatsoever pertinent to that subject.
14. The term **“identify,”** when used in reference to a natural person means to provide his or her (1) full name and (2) present or last known position or business affiliation, job title, employment address, and telephone number (designating which).

**CITY OF CIBOLO'S SECOND REQUESTS FOR ADMISSION TO
GREEN VALLEY SPECIAL UTILITY DISTRICT**

- Cibolo RFA 2-1 Admit that GVSUD's 2014 Water Master Plan is the most recent comprehensive planning and/or engineering document for GVSUD's water system.
- Cibolo RFA 2-2 Admit that GVSUD's 2006 Wastewater Master Plan is the most recent comprehensive planning and/or engineering document for GVSUD's wastewater system.
- Cibolo RFA 2-3 Admit that GVSUD does not possess a Texas Pollutant Discharge Elimination System ("TPDES") permit that has been approved by the Texas Commission on Environmental Quality.
- Cibolo RFA 2-4 Admit that GVSUD has not submitted designs to the Texas Commission on Environmental Quality for a wastewater treatment facility.
- Cibolo RFA 2-5 Admit that GVSUD has not submitted designs to the Texas Commission on Environmental Quality for a wastewater collection system.
- Cibolo RFA 2-6 Admit that GVSUD has not submitted designs to the Texas Commission on Environmental Quality for a wastewater collection system that could be installed to serve the area colored in light blue in Attachment A to the City's Application, which is attached hereto as Attachment 1.
- Cibolo RFA 2-7 Admit that GVSUD does not have final approval from the Texas Commission on Environmental Quality of its designs for a wastewater treatment facility.
- Cibolo RFA 2-8 Admit that GVSUD does not have final approval from the Texas Commission on Environmental Quality of its designs for a wastewater collection system.
- Cibolo RFA 2-9 Admit that GVSUD does not have final approval from the Texas Commission on Environmental Quality of its designs for a wastewater collection system that could be installed to serve the area colored in light blue in Attachment A to the City's Application, which is attached hereto as Attachment 1.
- Cibolo RFA 2-10 Admit that all or a portion of the 65 acres of land purchased by GVSUD outside of the area designated for single sewer CCN certification in the Application will be rendered useless and valueless upon decertification.

- Cibolo RFA 2-11 Admit that in the event of decertification, GVSUD intends to amend its pending TPDES permit application to address the decreased service area.
- Cibolo RFA 2-12 Admit that GVSUD's TPDES Permit Application, styled as Application for TPDES Permit No. WQ0015360001, pending at the TCEQ, includes the area colored in light blue in Attachment A to the City's Application, which is attached hereto as Attachment 1 in the service area of that application.
- Cibolo RFA 2-13 Admit that GVSUD intends to treat raw wastewater generated within the area colored in light blue in Attachment A to the City's Application, which is attached hereto as Attachment 1, with wastewater treatment plant that is contemplated in the GVSUD application pending at the TCEQ, styled as Application for TPDES Permit No. WQ0015360001.
- Cibolo RFA 2-14 Admit that a portion of the bond proceeds from GVSUD's Water System Revenue Bonds, Series 2003, have been used to design or construct wastewater infrastructure.
- Cibolo RFA 2-15 Admit that none of the bond proceeds from GVSUD's Water System Revenue Bonds, Series 2003, have been used to design or construct any wastewater infrastructure.
- Cibolo RFA 2-16 Admit that GVSUD anticipates growth in its wastewater service area beyond that portion to be decertified.
- Cibolo RFA 2-17 Admit that GVSUD's capital costs for planning, designing, and constructing the proposed wastewater treatment facility will be impacted upon decertification.
- Cibolo RFA 2-18 Admit that Cibolo Creek Municipal Authority is a political subdivision of the state of Texas.
- Cibolo RFA 2-19 Admit that on September 20, 2016, GVSUD had no existing retail sewer customers within the boundaries of its sewer CCN No 20973.
- Cibolo RFA 2-20 Admit that on March -8, 2016, GVSUD had no existing sewer infrastructure within the area colored in light blue in Attachment A to the City's Application, which is attached hereto as Attachment 1.
- Cibolo RFA 2-21 Admit that on September 20, 2016, GVSUD had no existing sewer infrastructure within the area colored in light blue in Attachment A to the City's Application, which is attached hereto as Attachment 1.

- Cibolo RFA 2-22 Admit that on September 20, 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.
- Cibolo RFA 2-23 Admit that on September 20, 2016, GVSUD had no existing sewer infrastructure within the area colored in light blue in Attachment 1.
- Cibolo RFA 2-24 Admit that on March 8, 2016, GVSUD had not entered into any agreements regarding the design or construction of sewer infrastructure within the area colored in light blue in Attachment A to the City's Application, which is attached hereto as Attachment 1.
- Cibolo RFA 2-25 Admit that on September 20, 2016, GVSUD had not entered into any agreements regarding the design or construction of sewer infrastructure within the area colored in light blue in Attachment A to the City's Application, which is attached hereto as Attachment 1.
- Cibolo RFA 2-26 Admit that between May 31, 2016 and September 20, 2016, GVSUD did not receive any requests for retail sewer service from landowners within the area colored in light blue in Attachment A to the City's Application, which is attached hereto as Attachment 1.
- Cibolo RFA 2-27 Admit that on March 8, 2016, GVSUD had no contracts with landowners or residents within the area colored in light blue in Attachment A to the City's Application, which is attached hereto as Attachment 1, to provide retail sewer service to such landowners or residents within the area colored in light blue in Attachment A to the City's Application, which is attached hereto as Attachment 1.
- Cibolo RFA 2-28 Admit that between September 20, 2011 and September 20, 2016, GVSUD has never received a request from the City to transfer any wastewater infrastructure to the City.
- Cibolo RFA 2-29 Admit that between September 20, 2011 and September 20, 2016, GVSUD has never received a request from the City to transfer any personal property to the City.
- Cibolo RFA 2-30 Admit that between September 20, 2011 and September 20, 2016, GVSUD has never received a request from the City to transfer any real property to the City.
- Cibolo RFA 2-31 Admit that Cibolo Creek Municipal Authority treats raw wastewater.
- Cibolo RFA 2-32 Admit that GVSUD's filed an appraisal report with the Public Utility Commission on June 28, 2016.

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