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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

BEFORE THE PUBLIC UTILITY

PUBLIC UTILITY COMMISSION
FILING CLERK

COMMISSION OF TEXAS

GREEN VALLEY SUD'S RESPONSE TO CIBOLO'S
SECOND REQUESTS FOR ADMISSION

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 Second Requests for Admission to Green Valley SUD.

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
(512) 474-9888 (fax)

ATTORNEYS FOR GREEN VALLEY SPECIAL UTILITY
DISTRICT

CERTIFICATE OF SERVICE

I hereby CERTIFY that on October 10, 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

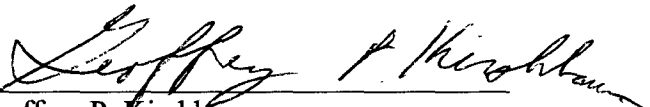
via fax to: (512) 472-0532

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



Geoffrey P. Kirshbaum

RESPONSE TO REQUESTS FOR ADMISSION

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.

RESPONSE: Admit

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.

RESPONSE: Deny

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.

RESPONSE: Admit

Cibolo RFA 2-4 Admit that GVSUD has not submitted designs to the Texas Commission on Environmental Quality for a wastewater treatment facility.

RESPONSE: Admit

Cibolo RFA 2-5 Admit that GVSUD has not submitted designs to the Texas Commission on Environmental Quality for a wastewater collection system.

RESPONSE: Admit

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 I.

RESPONSE: Admit

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.

RESPONSE: Admit

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.

RESPONSE: Admit

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.

RESPONSE: Admit

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.

RESPONSE: Deny

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.

RESPONSE: Cannot admit or deny. GVSUD will make a determination on this issue if decertification occurs before GVSUD receives the TPDES Permit.

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.

RESPONSE: Admit

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.

RESPONSE: Admit

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.

RESPONSE: Deny

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.

RESPONSE: Admit

Cibolo RFA 2-16 Admit that GVSUD anticipates growth in its wastewater service area beyond that portion to be decertified.

RESPONSE: Admit

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.

RESPONSE: Deny

Cibolo RFA 2-18 Admit that Cibolo Creek Municipal Authority is a political subdivision of the state of Texas.

RESPONSE: Admit

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.

RESPONSE: Admit

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.

RESPONSE: Admit

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.

RESPONSE: Admit

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.

RESPONSE: Admit

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.

RESPONSE: Admit

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.

RESPONSE: Deny

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.

RESPONSE: Deny

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.

RESPONSE: Admit

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.

RESPONSE: Admit

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.

RESPONSE: Admit

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.

RESPONSE: Admit

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.

RESPONSE: Admit

Cibolo RFA 2-31 Admit that Cibolo Creek Municipal Authority treats raw wastewater.

RESPONSE: Admit

Cibolo RFA 2-32 Admit that GVSUD's filed an appraisal report with the Public Utility Commission on June 28, 2016.

RESPONSE: Admit