

Control Number: 45781



Item Number: 27

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**SOAH DOCKET NO. 473-16-5010.WS**  
**PUC DOCKET NO. 45781**

RECEIVED

**APPLICATION OF CITY OF  
PORTLAND TO AMEND ITS  
CERTIFICATE OF CONVENIENCE  
AND NECESSITY IN SAN PATRICIO  
COUNTY**

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§

**BEFORE THE STATE OFFICE**

2017 FEB 21 AM 10:13  
PUBLIC UTILITY COMMISSION  
OF FILING CLERK

**ADMINISTRATIVE HEARINGS**

**COMMISSION STAFF'S FIRST REQUEST FOR INFORMATION TO  
CITY OF PORTLAND (PORTLAND)  
QUESTION NOS. STAFF 1-1 THROUGH STAFF 1-4**

Pursuant to 16 Tex. Admin. Code § 22.144 of the Commission's Procedural Rules, the Staff of the Public Utility Commission of Texas (Staff) requests that the City of Portland (Portland) by and through its attorneys of record, provide the following information and answer the following question(s) under oath. The question(s) shall be answered in sufficient detail to fully present all of the relevant facts, within the time limit provided by the Presiding Officer or within 20 days, if the Presiding Officer has not provided a time limit. Please copy the question immediately above the answer to each question. These question(s) are continuing in nature, and if there is a relevant change in circumstances, submit an amended answer, under oath, as a supplement to your original answer. State the name of the witness in this cause who will sponsor the answer to the question and can vouch for the truth of the answer.

Provide an original and three copies of your answers to the questions to the Filing Clerk, Public Utility Commission of Texas, 1701 N. Congress Avenue, P.O. Box 13326, Austin, Texas 78711-3326.


Dated: February 23, 2017

Respectfully Submitted,

**PUBLIC UTILITY COMMISSION OF TEXAS  
LEGAL DIVISION**

Margaret Uhlig Pemberton  
Division Director

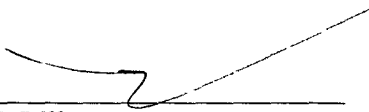
Karen S. Hubbard  
Managing Attorney

  
\_\_\_\_\_  
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**CERTIFICATE OF SERVICE**

I certify that a copy of this document will be served on all parties of record on February 23, 2017 in accordance with 16 TAC § 22.74.

  
\_\_\_\_\_  
Landon J. Lill

**SOAH DOCKET NO. 473-16-5010.WS  
PUC DOCKET NO. 45871**

**COMMISSION STAFF'S FIRST REQUEST FOR INFORMATION TO  
CITY OF PORTLAND (PORTLAND)  
QUESTION NOS. STAFF 1-1 THROUGH STAFF 1-4**

**DEFINITIONS**

- A. **“Portland”, “the City” or “you”** refers to the City of Portland and any person acting or purporting to act on their behalf, including without limitation, attorneys, agents, advisors, investigators, representatives, employees or other persons.
- B. **“Document”** includes any written, recorded, or graphic matter, however produced or reproduced, including but not limited to correspondence, telegrams, contracts, agreements, notes in any form, memoranda, diaries, voice recording tapes, microfilms, pictures, computer media, work papers, calendars, minutes of meetings or other writings or graphic matter, including copies containing marginal notes or variations of any of the foregoing, now or previously in your possession. In the event any documents requested by this Request for Information have been transferred beyond the Company's control, describe the circumstances under which the document was destroyed or transferred and provide an exact citation to the subject document. In the event that documents containing the exact information do not exist, but documents do exist which contain portions of the required information or which contain substantially similar information, then the definition of “documents” shall include the documents which do not exist and these documents will be provided.

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CITY OF PORTLAND (PORTLAND)  
QUESTION NOS. STAFF 1-1 THROUGH STAFF 1-4**

**INSTRUCTIONS**

- 1) Pursuant to 16 Tex. Admin. Code § 22.144(c)(2), Staff requests that answers to the requests for information be made under oath.
- 2) Please copy the question immediately above the answer to each question. State the name of the witness in this cause who will sponsor the answer to the question and can vouch for the truth of the answer.
- 3) These questions are continuing in nature, and if there is a relevant change in circumstances, submit an amended answer, under oath, as a supplement to your original answer.
- 4) Words used in the plural shall also be taken to mean and include the singular. Words used in the singular shall also be taken to mean and include the plural.
- 5) The present tense shall be construed to include the past tense, and the past tense shall be construed to include the present tense.
- 6) If any document is withheld under any claim of privilege, please furnish a list identifying each document for which a privilege is claimed, together with the following information: date, sender, recipients or copies, subject matter of the document, and the basis upon which such privilege is claimed.
- 7) Pursuant to 16 Tex. Admin. Code § 22.144(g)(4), if the response to any request is voluminous, please provide a detailed index of the voluminous material.
- 8) Staff requests that each item of information be made available as it is completed, rather than upon completion of all information requested.

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QUESTION NOS. STAFF 1-1 THROUGH STAFF 1-4**

- Staff 1-1      Provide information showing that the City has the capacity to provide for an additional 5700+ new connections? Does the currently enforced purchase water agreement with San Patricio Municipal Water District SPMWD allow enough water to be able to supply these additional connections?
- Staff 1-2      As the increase in connections is great then 10% of your current connection count has the City submitted plans and specifications to the TCEQ regarding the installation of additional infrastructure that will allow the City to serve the newly proposed areas?
- Staff 1-3      Does the City have a waste water permit that will meet the requirements of adding 5700+ connections to the City?
- If no, has the City applied for a new permit?
  - What would the Cities wastewater outflow be with all of the new customers?
- Staff 1-4      As SPMWD can or does provide like service in the area, has the applicant received consent to provide water and sewer service within the district?