



Control Number: 46120



Item Number: 55

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PUC DOCKET NO. 46120
SOAH DOCKET NO. 473-16-5823.WS 2017 JAN 17 AM 10: 01

CITY OF MIDLOTHIAN NOTICE OF
INTENT TO PROVIDE WATER
SERVICE TO LAND DECERTIFIED
FROM MOUNTAIN PEAK SPECIAL
UTILITY DISTRICT

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BEFORE THE COMMISSION
FILING CLERK

PUBLIC UTILITY COMMISSION
OF TEXAS

**MOUNTAIN PEAK SPECIAL UTILITY DISTRICT'S SECOND SUPPLEMENTAL
RESPONSES TO CITY OF MIDLOTHIAN'S SECOND SET OF REQUESTS FOR
INFORMATION AND REQUEST FOR ADMISSION TO MOUNTAIN PEAK SPECIAL
UTILITY DISTRICT**

Mountain Peak Special Utility District ("Mountain Peak") files these Second Supplemental Responses to the City of Midlothian's ("City") Second Set of Requests for Information and Request for Admission to Mountain Peak Special Utility District. Mountain Peak Special Utility District agrees and stipulates that all parties may treat these responses as if the answers were filed under oath.

Respectfully submitted,

JACKSON WALKER L.L.P.

By: /s/ Mallory Beck
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Mallory Beck - State Bar No. 24073899
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Palmer, Texas 75152
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T: (972) 845-2222
F: (972) 845-3398

ATTORNEYS FOR MOUNTAIN PEAK
SPECIAL UTILITY DISTRICT

CERTIFICATE OF SERVICE

I hereby certify that on the 13th day of January 2017, a true and correct copy of the foregoing document was served on the individuals listed below by hand delivery, email, facsimile or First Class Mail.

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Paul M. Gonzalez
Davidson, Troilo, Ream, & Garza, P.C.
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512-936-7261
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512-936-7268 (Facsimile)

Attorney for the Public Utility Commission of Texas

/s/ Mallory Beck
Mallory Beck

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CITY OF MIDLOTHIAN NOTICE OF § BEFORE THE
INTENT TO PROVIDE WATER §
SERVICE TO LAND DECERTIFIED § PUBLIC UTILITY COMMISSION
FROM MOUNTAIN PEAK SPECIAL §
UTILITY DISTRICT § OF TEXAS

**MOUNTAIN PEAK SPECIAL UTILITY DISTRICT'S RESPONSES TO
CITY OF MIDLOTHIAN'S SECOND SET OF REQUESTS FOR INFORMATION AND
REQUEST FOR ADMISSION TO MOUNTAIN PEAK SPECIAL UTILITY DISTRICT**

City's RFI No. 2-2. To the extent not provided in response to Midlothian's RFI No. 1-4, identify any water service facilities of Mountain Peak *within* the Park Property, including for each facility:

- (a) The facility's use and available capacity as of May 1, 2015;
- (b) Identification of any remaining debt service for loans/bonds to finance design and/or construction as of May 1, 2015; and
- (c) Any changes to the facility's use and available capacity since May 1, 2015.

RESPONSE:

Pursuant to 16 Tex. Admin. Code § 22.144(c)(2)(E), please see documents previously produced in response to RFI 1-4 bates labeled MPSUD00001-00324 and MPSUD02401-02415. Mountain Peak also owns a 6" waterline located within the Park Property. It is currently used to serve existing customers to the east of the Park Property. It is not at full capacity. It could have and would have been used to serve the Park Property; therefore, since May 1, 2015, its use has been limited by the decertification of the Park Property. For any remaining debt service, please see Mountain Peak's response to RFI No. 1-19.

Prepared/Sponsored by: Randel Kirk
 General Manager
 Mountain Peak Special Utility District

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REQUEST FOR ADMISSION TO MOUNTAIN PEAK SPECIAL UTILITY DISTRICT**

City’s RFI No. 2-4. To the extent not provided in response to Midlothian's RFI No. 1-15, provide any maps showing the location and nature of the facilities that make up Mountain Peak's water system, indicating interconnections, transmission and distribution lines, pumping facilities, water wells, and storage facilities as they existed on or about May 1, 2015.

RESPONSE:

Pursuant to 16 Tex. Admin. Code § 22.144(c)(2)(E), please see documents previously produced in response to RFI 1-15 bates labeled MPSUD00315-00324 and documents enclosed herein bates labeled MPSUD03984.

Prepared/Sponsored by: Randel Kirk
 General Manager
 Mountain Peak Special Utility District

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City's RFI No 2-9. Identify your water wells as of (a) the end of 2006, (b) May 1, 2015, and (c) today; including, for each well, its location, depth and diameter, the date it was placed into operation, the cost of construction, its as-constructed and current peak capacity, and dates when it has been inactive/unavailable.

RESPONSE:

Subject to Mountain Peak's objection to this Request, Mountain Peak responds:

Facility	Location (Longitude / Latitude)	Depth	Diameter	Date Placed into Service	Cost of Construction	Rated Capacity (GPM)	Tested Capacity (GPM)
Well No. 1	-97.023785 / 32.421564	2411	10 ¾	November 1970	\$170,000.00	250	385
Well No. 2	-97.002552 / 32.442287	2420	10 ¾	February 1976	\$260,000.00	200	250
Well No. 3	-97.032119 / 32.318535	2200	10 ¾	April 1980	\$300,000.00	175	175
Well No. 4	-97.009885 / 32.417639	2408	10 ¾	August 1989	\$500,000.00	400	415
Well No. 5	-96.999986 / 32.460228	2415	14	April 3, 2005	\$500,000.00	650	655
Well No. 6	-97.010265 / 32.435268	2410	14	February 6, 2004	\$500,000.00	650	650

Well No. 9a	-97.01055 / 32.435625	779	10	June 16, 2015	\$240,000.00	200	175
Well No. 2a	-97.002652 / 32.442153	792	10	August 20, 2014	\$217,850.00	150	132

Prepared/Sponsored by: Randel Kirk
 General Manager
 Mountain Peak Special Utility District

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REQUEST FOR ADMISSION TO MOUNTAIN PEAK SPECIAL UTILITY DISTRICT**

City's RFI No. 2-26. Please produce all documents prepared, considered, reviewed, or relied upon by each testifying expert and/or consulting expert whose opinions or impressions have been reviewed by a testifying expert or whose work has formed the basis, in whole or in part, for the mental impressions and opinions of an expert who may be called to testify.

RESPONSE:

Please see documents previously produced and bates labeled MPSUD00001-00314, MPSUD00328-00338, MPSUD02324-02334, MPSUD02336, MPSUD02401-02406, MPSUD02411-02456, MPSUD02830-02957, MPSUD02982-02989, and MPSUD03516-03889. Please also see documents produced herein and bates labeled MPSUD03988-03989. In addition, see documents in PUC Docket No. 46120, including Item No. 6, 7, 9, 10, 22, 24, 26, and 28-30 and documents in PUC Docket No. 45858, including Item No. 42.

Prepared/Sponsored by: Randel Kirk
 General Manager
 Mountain Peak Special Utility District

**PUC DOCKET NO. 46120
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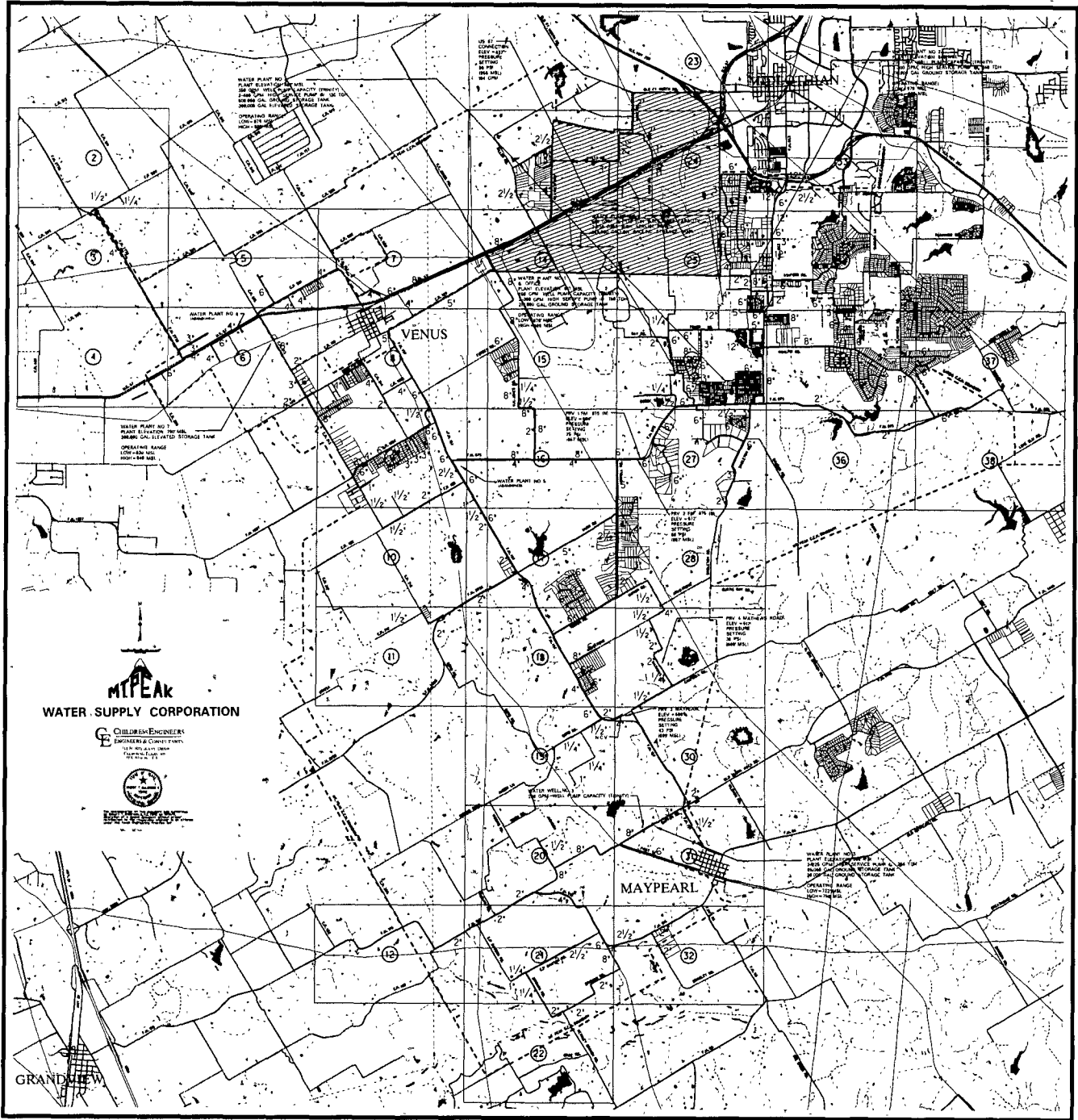
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REQUEST FOR ADMISSION TO MOUNTAIN PEAK SPECIAL UTILITY DISTRICT**

City’s RFI No. 2-29. Please produce all writings, drawings, graphs, charts, maps, photographs, or other tangible items intended to be used by You as exhibits, including demonstrative exhibits, in a hearing in this proceeding.

RESPONSE:

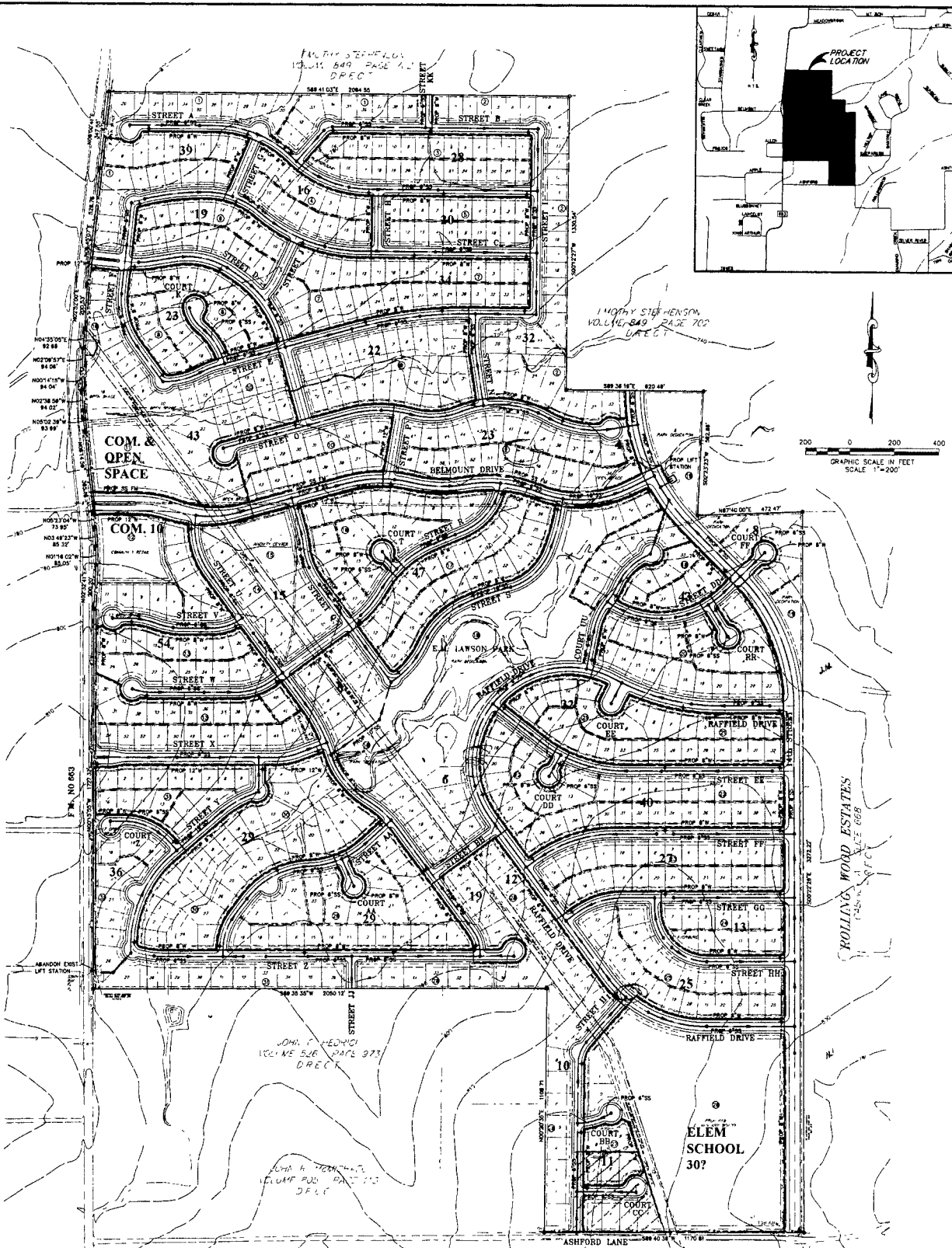
 Please see the documents produced in response to this request enclosed herein and bates labeled MPSUD03965-03972, MPSUD03984, and MPSUD03988-03989. Please also see documents bates labeled MPSUD00316, MPSUD00347-00357, MPSUD02336-02331, MPSUD03778-03798, and MPSUD03510-03515.

Prepared/Sponsored by: Randy Gracy
 General Manager
 Mountain Peak Special Utility District




MTPeak
WATER SUPPLY CORPORATION
 ENGINEERS & CONSULTANTS
 1000 S. MAIN ST. SUITE 100
 GRANDVIEW, CO. 80037
 (303) 441-1100
 www.mtpeak.com

GRANDVIEW



A PRELIMINARY UTILITY PLAN FOR

LOTS 1-39, BLOCK 1, LOTS 1-59, BLOCK 2, LOTS 1-28, BLOCK 3; LOTS 1-16, BLOCK 4; LOTS 1-20, BLOCK 5, LOTS 1-19, BLOCK 6, LOTS 1-34, BLOCK 7, LOTS 1-23, BLOCK 8, LOTS 1-22, BLOCK 9; LOTS 1-43, BLOCK 10, LOT 1, BLOCK 11, LOT 1, BLOCK 12, LOTS 1-54, BLOCK 13, LOTS 1-13, BLOCK 14, LOT 1, BLOCK 15; LOTS 1-21, BLOCK 16, LOTS 1-26, BLOCK 17, LOTS 1-40, BLOCK 18; LOTS 1-8, BLOCK 19; LOTS 1-23, BLOCK 20, LOTS 1-32, BLOCK 21; LOTS 1-40, BLOCK 22, LOTS 1-27, BLOCK 23; LOTS 1-13, BLOCK 24, LOTS 1-25, BLOCK 25; LOT 1, BLOCK 26, LOTS 1-12, BLOCK 27; LOTS 1-36, BLOCK 28, LOTS 1-29, BLOCK 29; LOTS 1-29, BLOCK 30, LOTS 1-36, BLOCK 31

LAWSON FARMS

AN ADDITION TO THE CITY OF MIDLOTHIAN, ELLIS COUNTY, TEXAS
 AND BEING SITUATED IN THE MARTHA BRENNAN SURVEY, ABSTRACT NO. 43, THE J.M. GARVIN SURVEY, ABSTRACT NO. 424,
 THE J.M. GARVIN SURVEY, ABSTRACT NO. 424, THE M.T. HAWKINS SURVEY, ABSTRACT NO. 463

JANUARY 2004 752 RESIDENTIAL LOTS 290 131 ACRES
 2 COMMUNITY RETAIL LOTS
 13 OPEN SPACE LOTS
 3 PARK AREAS
 1 AMENITY CENTER LOT
 1 SCHOOL SITE

OWNER/DEVELOPER
 SKJ LAWSON FARMS DEVELOPMENT, LP
 411 W. 7TH STREET, SUITE 1004
 FORT WORTH, TEXAS 76102
 (817) 877-0422
 KIM GILL

ENGINEER
 WELCH ENGINEERING, INC
 4109 CAGLE DRIVE, SUITE D
 NORTH RICHLAND HILLS, TEXAS 76180
 (817) 569-2900
 TIM WELCH

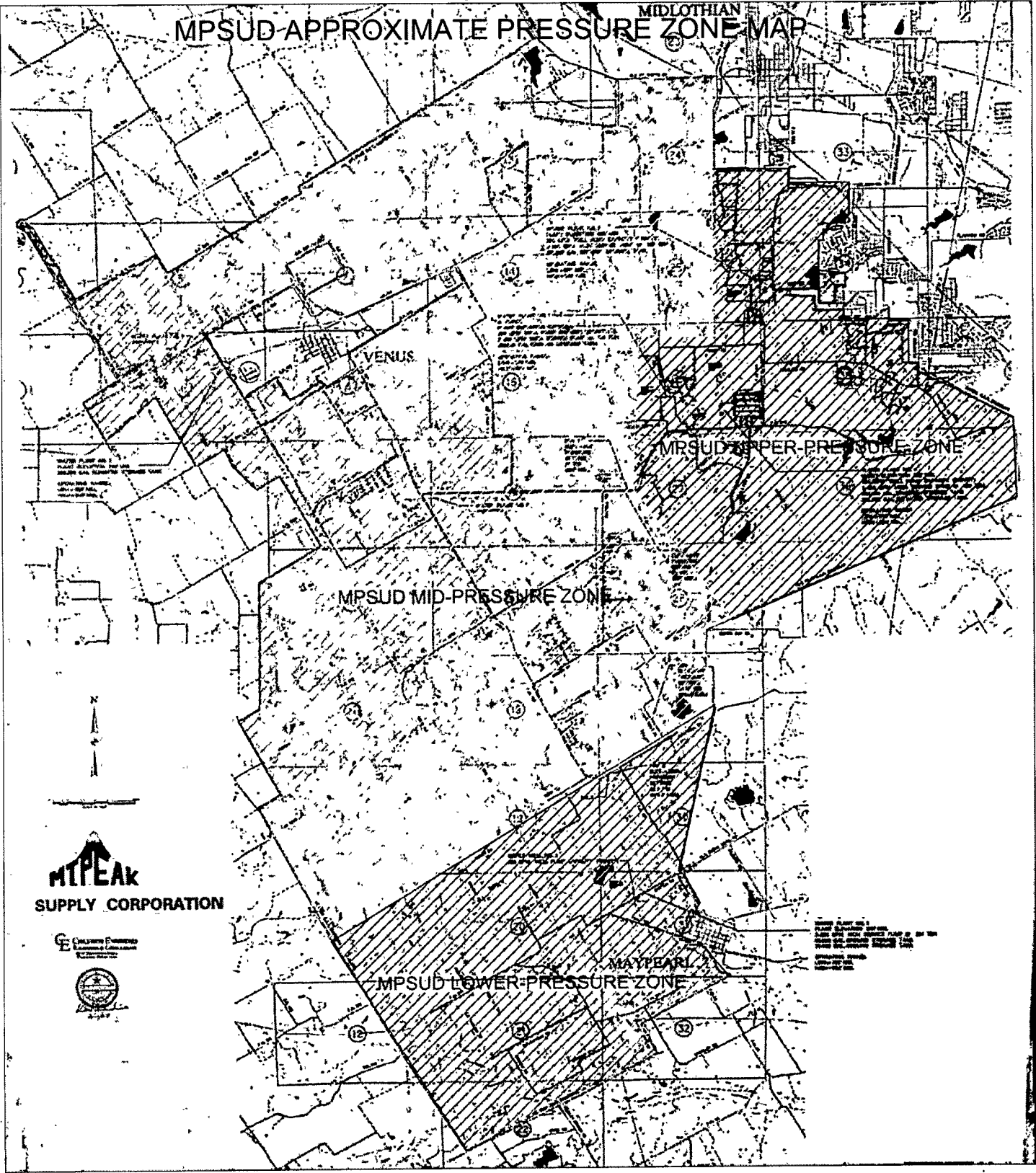
SURVEYOR
 WHITFIELD-HALL SURVEYORS
 3559 WILLIAMS ROAD, SUITE 107
 FORT WORTH, TEXAS 76116
 (817) 560-2916
 JOHNNY WILLIAMS

LEGEND

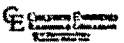
	PROPOSED WATER LINE AND VALVE
	PROPOSED FIRE HYDRANT
	PROPOSED SEWER LINE WITH MANHOLE
	PROPOSED SANITARY SEWER FORCE MAIN
	EXISTING WATER LINE AND VALVE
	EXISTING FIRE HYDRANT
	EXISTING SEWER LINE WITH MANHOLE
	EXISTING STORM SEWER AND INLET
	EXISTING CONTOUR

MIDLOTHIAN

MPSUD-APPROXIMATE PRESSURE ZONE MAP



MTPEAK
SUPPLY CORPORATION



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UTILITY DISTRICT	§	OF TEXAS

**MOUNTAIN PEAK SPECIAL UTILITY DISTRICT'S
DOCUMENT PRODUCTION LOG
TO CITY OF MIDLOTHIAN'S REQUESTS FOR INFORMATION**

City of Midlothian RFI #	Responsive Bates Numbers
Produced 10/24/2016	
1-4, 1-5, 1-7, 1-18	MPSUD00001-00296 MPSUD02401-02415
1-4, 1-5, 1-7, 1-18, 1-22	MPSUD00297-00314
1-4, 1-5, 1-7, 1-15, 1-18, 1-21, 1-22, 1-23	MPSUD00315-00324
1-14	MPSUD00325-00357
1-16	MPSUD02416-02456
1-16, 1-17, 1-18, 1-23, 1-26, 1-27	MPSUD00358-00359
1-17	MPSUD00360-02101
1-19	MPSUD02102-02321
1-20	MPSUD02322-02323
1-21, 1-22, 1-23	MPSUD02324-02364 MPSUD02457-02476
1-21, 1-22, 1-23, 1-24, 1-25	MPSUD02457-02476
1-24	MPSUD02365-02391
1-26, 1-27	MPSUD02392-02394
1-28	MPSUD02395-02400

Produced 11/07/2016	
2-16	MPSUD02477-02522
2-18	MPSUD02523-02957
2-19	MPSUD02958-02989
Produced 12/16/2016	
1-1, 1-19, 1-24, 2-5, 2-31	MPSUD02990-02992
1-1, 1-19, 1-24, 2-31	MPSUD02993-03020
1-1, 1-24	MPSUD03021-03043
1-1, 1-24, 1-25	MPSUD03044-03290
1-4, 1-5, 1-7, 1-16, 1-18, 1-30, 2-2, 2-3, 2-6	MPSUD03291-03297
1-4, 1-5, 1-7, 1-18, 1-19, 1-30, 2-2, 2-3, 2-6, 2-31	MPSUD03298-03299
1-4, 1-5, 1-7, 1-18, 1-30, 2-2, 2-3, 2-6	MPSUD03300-03395
1-4, 1-5, 1-7, 1-30, 2-2, 2-3, 2- 6	MPSUD03396-03406
1-19; 2-31	MPSUD03407-03422
1-20	MPSUD03423-03504
2-21	MPSUD03505-03509
2-24	MPSUD03510-03515
2-26	MPSUD03516-03889
	<p><i>See</i></p> <p>MPSUD00001-00314 MPSUD00328-00338 MPSUD02324-02334 MPSUD02336 MPSUD02401-02406 MPSUD2411-02456 MPSUD02830-02957 MPSUD02982-02989</p> <p><i>See</i> PUC Docket No. 46140, Item No. 22 <i>See</i> PUC Docket No. 46140, Item No. 26 <i>See</i> PUC Docket No. 46140, Item No. 30 <i>See</i> PUC Docket No. 46140, Item No. 28 <i>See</i> PUC Docket No. 46140, Item No. 9 <i>See</i> PUC Docket No. 46140, Item No. 6 <i>See</i> PUC Docket No. 46140, Item No. 7 <i>See</i> PUC Docket No. 46140, Item No. 29 <i>See</i> PUC Docket No. 46140, Item No. 10</p>

	See PUC Docket No. 46140, Item No. 24 See PUC Docket No. 45848; Item No. 42
Produced 01/13/2017	
1-1	MPSUD03890-03947
1-4, 1-5, 1-7, 1-18	MPSUD03985-03987
1-16, 1-17, 1-18, 1-22 and 1-29	MPSUD03948-03983
2-4	MPSUD03984
2-26 and 2-29	MPSUD03988-03989