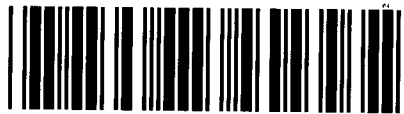




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DOCKET NO. 46809

APPLICATION OF CASH SPECIAL § PUBLIC UTILITY COMMISSION
UTILITY DISTRICT TO AMEND A §
CERTIFICATE OF CONVENIENCE § OF TEXAS
AND NECESSITY IN HOPKINS §
COUNTY §

**COMMISSION STAFF'S FIRST REQUEST FOR
INFORMATION TO CASH SPECIAL UTILITY DISTRICT (CASH)
QUESTION NOS. STAFF 1-1 THROUGH STAFF 1-5**

Pursuant to 16 Tex. Admin. Code (TAC) § 22:144, the Staff of the Public Utility Commission of Texas (Staff) requests that Cash Special Utility District (Cash) 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.

RECEIVED
2017 MAR -2 AM 11:32
PUBLIC UTILITY COMMISSION
FILING CLERK

Dated: March 2, 2017

Respectfully Submitted,

**PUBLIC UTILITY COMMISSION OF TEXAS,
LEGAL DIVISION**

Margaret Uhlig Pemberton
Division Director

Karen S. Hubbard
Managing Attorney



Ashley Nwonuma
State Bar No. 24096650
1701 N. Congress Avenue
P.O. Box 13326
Austin, Texas 78711-3326
(512) 936-7163
(512) 936-7268 (facsimile)
ashley.nwonuma@puc.texas.gov

DOCKET NO. 46809

CERTIFICATE OF SERVICE

I certify that a copy of this document will be served on all parties of record on March 2, 2017, in accordance with 16 Tex. Admin. Code § 22.74.



Ashley Nwonuma

DOCKET NO. 46809

**COMMISSION STAFF'S FIRST REQUEST FOR
INFORMATION TO CASH SPECIAL UTILITY DISTRICT (CASH)
QUESTION NOS. STAFF 1-1 THROUGH STAFF 1-5**

DEFINITIONS

- 1) "Cash", "the Company," or "you" refers to Cash Special Utility District and any person acting or purporting to act on their behalf, including without limitation, attorneys, agents, advisors, investigators, representatives, employees or other persons.
- 2) "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.

DOCKET NO. 46809

**COMMISSION STAFF'S FIRST REQUEST FOR
INFORMATION TO CASH SPECIAL UTILITY DISTRICT (CASH)
QUESTION NOS. STAFF 1-1 THROUGH STAFF 1-5**

INSTRUCTIONS

- 1) Pursuant to 16 TAC § 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 TAC § 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.

DOCKET NO. 46809

**COMMISSION STAFF'S FIRST REQUEST FOR
INFORMATION TO CASH SPECIAL UTILITY DISTRICT (CASH)
QUESTION NOS. STAFF 1-1 THROUGH STAFF 1-5**

- Staff 1-1 Please provide a copy of the TCEQ letter in response to your 85% report that explains how Cash SUD will provide the expected service demands to the remaining areas within the boundaries of its certificated area, pursuant to 30 TAC § 291.93.
- Staff 1-2 Please provide a timetable for expansion of all parts of the water system that has exceeded 85% of maximum capacity. The parts of the water system include the treatment plant storage, the Fate pumps, the Union Valley pumps, the Office pumps, the raw water pumps, the treatment plant capacity, and a new contract with North Texas MWD (NTMWD).
- Staff 1-3 Please provide the estimated expansion cost for each of the following items: treatment plant storage, the Fate pumps, the Union Valley pumps, the Office pumps, the raw water pumps, the treatment plant capacity, and a new contract with NTMWD.
- Staff 1-4 Please provide documentation for the funding mechanism used to finance the expansion of all parts of the water system.
- Staff 1-5 On page 32 of Attachment 7, Water Accountability is 28%. Please provide an explanation of this water loss, and what measures are being taken to reduce it.