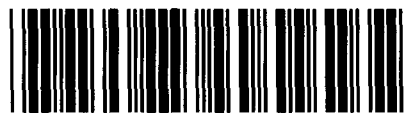




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**SOAH DOCKET NO. 473-17-5770.WS
PUC DOCKET NO. 46923**

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APPLICATION OF WOLFE AIRPARK CIVIC CLUB, INC. TO OBTAIN A WATER CERTIFICATE OF CONVENIENCE AND NECESSITY IN BRAZORIA COUNTY	§ § § § § § §	BEFORE THE STATE OFFICE OF ADMINISTRATIVE HEARINGS
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**COMMISSION STAFF'S FIRST REQUEST FOR INFORMATION TO
WOLFE AIRPARK CIVIC CLUB, INC.
QUESTION NOS. 1 THROUGH 10**

The Staff of the Public Utility Commission of Texas (Staff) requests that Wolfe Airpark Civic Club, Inc. (Wolfe Airpark or Applicant) 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.


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Respectfully Submitted,

**PUBLIC UTILITY COMMISSION OF
TEXAS LEGAL DIVISION**

Margaret Uhlig Pemberton
Division Director

Stephen Mack
Managing Attorney



Rachelle Nicolette Robles
State Bar No. 24060508
1701 N. Congress Avenue
P.O. Box 13326
Austin, Texas 78711-3326
(512) 936-7255
(512) 936-7268 (facsimile)
rachelle.robles@puc.texas.gov

**SOAH DOCKET NO. 473-17-5770.WS
PUC DOCKET NO. 46923**

CERTIFICATE OF SERVICE

I certify that a copy of this document will be served on all parties of record on this the
December 5, 2017 in accordance with 16 TAC § 22.74.



Rachelle Nicolette Robles

SOAH DOCKET NO. 473-17-5770.WS
PUC DOCKET NO. 46923

DEFINITIONS

- A. “Wolfe Airpark,” “the Company,” or “you” refers to the Wolfe Airpark Civic Club, Inc., 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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**COMMISSION STAFF'S FIRST REQUEST FOR INFORMATION TO
WOLFE AIRPARK CIVIC CLUB, INC.
QUESTION NOS. 1 THROUGH 9**

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(h)(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.

**SOAH DOCKET NO. 473-17-5770.WS
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**COMMISSION STAFF'S FIRST REQUEST FOR INFORMATION TO
WOLFE AIRPARK CIVIC CLUB, INC.
QUESTION NOS. 1 THROUGH 10**

- Staff 1-1** Please provide the historical and projected cash flow statements and balance sheets for water utility operations for the past five years and for the test year.
- Staff 1-2** If Wolfe Airpark anticipates growth in the number of customers for which it would provide water utility services, please provide an explanation, including projected income statements, projected expense statements, and projected balance sheet schedules.
- Staff 1-3** Please provide a copy of the current tariff by the City of Manvel and Wolfe Airpark's proposed tariff, listing all fees.
- Staff 1-4** Please provide a copy of Wolfe Airpark's Profit and Loss Statement and Balance Sheet for 2015.
- Staff 1-5** Please provide the general ledger supporting the chart of operating expenses relating to the proposed \$35.00 monthly charge for water utility services.
- Staff 1-6** Please refer to the answer provided in the Applicant's Direct Testimony in response to Question #10 in the section entitled "List of Issues and Applicant's Responses". Provide the agreement or contract that allows the Applicant to charge customers for "additional assessments (with regulatory approval) for any extraordinary and unanticipated expenses", as well as any actual historical assessments charged to the customers, including, but not limited to, what the charge was for, the amount of the charge, how the customers were charged, and the time increment for the charge.
- Staff 1-7** Please provide the Texas Commission on Environmental Quality's (TCEQ) approval letters for the distribution system for the requested area.
- Staff 1-8** Please provide a copy of the most recent Comprehensive Compliance Investigation from the TCEQ.
- Staff 1-9** Please provide the connection count and capacity of the well(s), pressure tank(s), ground storage tank(s), and pump(s) available.
- Staff 1-10** Please provide a list of individuals who will be involved with the management of the water utility, including, but not limited to, the names of the individuals and their experience with water utility management.