



Control Number: 47058



Item Number: 16

Addendum StartPage: 0

PUC DOCKET NO. 47058

SOAH DOCKET NO. 473-17-4369. WS

RECEIVED

2017 JUL 11 AM 10:03

PUBLIC UTILITY COMMISSION
FILING CLERK

RATEPAYERS' APPEAL OF THE
DECISION BY THE SAN PATRICIO
COUNTY MUNICIPAL UTILITY
DISTRICT NO. 1 TO CHANGE RATES

RATEPAYERS' FIRST REQUEST FOR INFORMATION TO SAN PATRICIO COUNTY MUNICIPAL UTILITY
DISTRICT NO. 1

Pursuant to 16 Tex. Admin Code section 22.144 of the Commission's procedural rules the appellant, Camp Stryker RV park, requests that San Patricio County Municipal Utility District No. 1 provide the following information.

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. Please respond within 20 days.

Provide an original and three copies of your answers to the questions to the filing clerk Public Utility Commission of Texas, 1701 N. Congress Ave P.O. box 13326, Austin TX, 78711-3326

QUESTION NUMBER 1.

Did any RV parks exist within the Utility District prior to January 1, 2017? If so, please provide the rates that were charged to previous RV park/s.

QUESTION NUMBER 2.

How many total active meters (Commercial/Residential) did the MUD service in January, 2012?

QUESTION NUMBER 3.

How many total active meters (Commercial/Residential) did the MUD service in June 2017?

QUESTION NUMBER 4.

Describe what additional burden in water usage, materials or labor the MUD has undertaken as a direct result of construction and operation of Camp Stryker RV park.

QUESTION NUMBER 5.

Has the MUD engaged any engineer or expert to analyze the MUD's capacity to deliver water to its customers? If so, provide the contact information for said expert. Provide any written report that exists.

16



QUESTION NUMBER 6.

How many meters are utilized by the MUD to service Camp Stryker RV park?

QUESTION NUMBER 7.

Who paid for the installation of the water meter/s referred to in question 6?

QUESTION NUMBER 8.

Has the total amount of water supplied to all customers by the MUD increased or decreased between January 1, 2012 and June 1, 2017? Provide gallonage numbers for the two dates.

QUESTION NUMBER 9.

How much total water in gallonage is utilized by the average house within the MUD district? Give approximate range based on bills.

QUESTION NUMBER 10.

How much water has been used to date by the Camp Stryker RV Park in 2017?

QUESTION NUMBER 11

What is the capacity of the MUD'S wells? Please answer in Gallons/minute.

QUESTION NUMBER 12

What additional burden to the MUD caused by the water usage of Camp Stryker RV Park required the MUD to increase its charge for water to the Park in March, 2017 to more than ten times what it charged one month earlier (February, 2017), based on gallonage used.

QUESTION NUMBER 13

What is the capacity of the MUD water and sewer delivery apparatus and what is the current per cent of capacity being utilized? Give water and sewer numbers separately.

PROVIDE AN ORIGINAL AND THREE COPIES OF YOUR ANSWERS TO THE QUESTIONS TO THE FILING CLERK, PUBLIC UTILITY COMMISSION OF TEXAS, 1701 NORTH CONGRESS AVE. P.O. BOX 13326, AUSTIN TEXAS 78711-3326

Respectfully submitted,



July 7, 2017

Robert S. Hunter, owner, Camp Stryker RV Park, Appellant. PUC docket No. 47058, SOAH Docket No. 473-17-4369. WS

4369.WS

CERTIFICATE OF SERVICE, DOCKET NO. 47058 PUC, SOAH DOCKET NO. 473-17-



I CERTIFY THAT A COPY OF THIS DOCUMENT WAS SERVED ON San Patricio County Municipal Utility District No. 1 by personal delivery to the following person at the MUD headquarters office at 17886, Highway 234 Edroy Texas. Person served: GENEVA CASTRO, CLERK

Service was made on JULY 7 2017 at 17886 HWY 234

Signed: 

DUNCAN HUNTER

