



Control Number: 47647



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DOCKET NO. 47647

**APPLICATION OF RINCON WATER §
SUPPLY CORPORATION TO AMEND §
A WATER CERTIFICATE OF §
CONVENIENCE AND NECESSITY IN §
SAN PATRICIO AND ARANSAS §
COUNTIES §**

PUBLIC UTILITY COMMISSION

OF TEXAS

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**COMMISSION STAFF'S FIRST REQUEST FOR INFORMATION
TO RINCON WATER SUPPLY CORPORATION (RINCON WSC)
QUESTION NOS. STAFF 1-1 THROUGH STAFF 1-5**

Pursuant to 16 Tex. Admin. Code Ann. § 22.144 (TAC), the Staff of the Public Utility Commission of Texas (Staff) requests that Rincon Water Supply Corporation (Rincon WSC) 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 78712-3326.

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Respectfully Submitted,

**PUBLIC UTILITY COMMISSION OF TEXAS
LEGAL DIVISION**

Margaret Uhlig Pemberton
Division Director

Katherine Lengieza Gross
Managing Attorney



Joshua Adam Barron
State Bar No. 24087146
1701 N. Congress Avenue
P.O. Box 13326
Austin, Texas 78711-3326
(512) 936-7235
(512) 936-7268 (facsimile)
Joshua.barron@puc.texas.gov

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CERTIFICATE OF SERVICE

I certify that a copy of this document will be served on all parties of record on December 11, 2017 in accordance with 16 TAC § 22.74.



Joshua Adam Barron

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**COMMISSION STAFF'S FIRST REQUEST FOR INFORMATION
TO RINCON WATER SUPPLY CORPORATION (RINCON WSC)
QUESTION NOS. STAFF 1-1 THROUGH STAFF 1-5**

DEFINITIONS

- A. "Rincon WSC," "the Company" or "you" refers to the Rincon Water Supply Corporation 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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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.

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QUESTION NOS. STAFF 1-1 THROUGH STAFF 1-5**

- Staff 1-1 Please provide a copy of the Prosperity Bank Loan agreement #313391500.
- a) Provide an amortization schedule for each existing loan liability of the applicant as of December 4, 2017. The schedule should provide monthly note payments detailing principal, interest, the name of the lender and number designation of the note payable.
 - b) Please provide a copy of all existing loan agreements.
 - c) Provide information on any loans currently being requested for approval including total principal of the loans, lender name, projected interest rate, and an amortization schedule with monthly payments summarized by year.
- Staff 1-2 Please provide three year projections, including: a balance sheet, income statement, and expense statement as defined in the CCN application (page 24 of 25.)
- Staff 1-3 Provide a capital improvement plan with cost estimates and details on funding of costs (loans or through equity) and dates of completion for water service to the area being requested.
- Staff 1-4 For each expansion area requested, EA-1 through EA-9 (pages 45-57 of item 1), the acreage and the total number of current customers was provided. Please also provide the:
- a) Total acreage associated with the total current customers for each expansion area.
 - b) Total acreage and future connections associated with any future individual customer requests for service or developers' requests for service and supporting documentation for those figures for each expansion area.
 - c) Please also provide the remaining acreage associated with no current or future customers for each expansion area.
- Staff 1-5 Please provide an explanation for how the utility will remedy the following violations:
- a) Failed to monitor nitrite and nitrate (as nitrogen) quarterly.
 - b) Failed to create a written Nitrification Action Plan (NAP) that contains the system-specific plan for monitoring free ammonia, monochloramine, total chlorine, nitrite, and nitrate levels.