



Control Number: 47912



Item Number: 68

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DOCKET NO. 47912

**RATEPAYERS' APPEAL OF THE
DECISION BY SOUTH CENTRAL
CALHOUN COUNTY WATER
CONTROL AND IMPROVEMENT
DISTRICT NO. 1 TO CHANGE RATES**

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PUBLIC UTILITY COMMISSION

OF TEXAS

**COMMISSION STAFF'S THIRD REQUEST FOR INFORMATION
TO SOUTH CENTRAL CALHOUN COUNTY WATER CONTROL
AND IMPROVEMENT DISTRICT NO. 1 (SCCCWCID)
QUESTION NOS. STAFF 3-1 THROUGH STAFF 3-5**

Pursuant to 16 Texas Administrative Code (TAC) § 22.144 of the Commission's Procedural Rules, the Staff of the Public Utility Commission of Texas (Staff) requests that South Central Calhoun County Water Control and Improvement District No. 1, 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.

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Dated: January 17, 2020

Respectfully Submitted,

**PUBLIC UTILITY COMMISSION OF TEXAS
LEGAL DIVISION**

Thomas S. Hunter
Division Director

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**DOCKET NO. 47912
CERTIFICATE OF SERVICE**

I certify that a copy of this document will be served on all parties of record on January 17, 2020, in accordance with 16 TAC § 22.74.


John Harrison

PUC DOCKET NO. 47912

**COMMISSION STAFF'S THIRD REQUEST FOR INFORMATION
TO SOUTH CENTRAL CALHOUN COUNTY WATER CONTROL
AND IMPROVEMENT DISTRICT NO. 1 (SCCCWCID)
QUESTION NOS. STAFF 3-1 THROUGH STAFF 3-5**

DEFINITIONS

- 1) "SCCCWCID," "the Company" or "you" refers to the South Central Calhoun County Water Control and Improvement District No. 1, 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.

PUC DOCKET NO. 47912

**COMMISSION STAFF'S THIRD REQUEST FOR INFORMATION
TO SOUTH CENTRAL CALHOUN COUNTY WATER CONTROL
AND IMPROVEMENT DISTRICT NO. 1 (SCCCWCID)
QUESTION NOS. STAFF 3-1 THROUGH STAFF 3-5**

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(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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**COMMISSION STAFF'S THIRD REQUEST FOR INFORMATION
TO SOUTH CENTRAL CALHOUN COUNTY WATER CONTROL
AND IMPROVEMENT DISTRICT NO. 1 (SCCCWCID)
QUESTION NOS. STAFF 3-1 THROUGH STAFF 3-5**

- Staff 3-1 The supplemental briefing by SCCCWCID, filed in response to State Office of Administrative Hearings (SOAH) Order No. 4, on October 11, 2019 indicates that the district incurred a deficit of \$58,688, and therefore could not afford to make all of the repairs and replacements indicated as necessary on the \$62,533 list of repairs. Please provide an itemized list of the repairs and replacements that were not completed as expected.
- Staff 3-2 Please provide additional details regarding the District's anticipated second rate increase should the Commission approve the rates in Docket 47912.
- Staff 3-3 Please confirm the repairs for the damaged roof blowers were not included in the rates.
- Staff 3-4 Please provide additional details regarding the informal estimates for drying field sludge removal (\$11,000) and control board at lift station repair (\$352.50). Please indicate when these quotes were received, how they were made available to the board, and whether these costs were factored into the \$62,533 list of repairs and replacements before the September 15, 2017 board vote.
- Staff 3-5 Please provide an estimated itemized list of anticipated service maintenance costs that recur annually on items and equipment on the list of repairs that do not require annual replacement.