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SOAH DOCKET NO. 473-18-3006.WS
PUC DOCKET NO. 47976

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APPLICATION OF LIBERTY
UTILITIES (SILVERLEAF WATER)
LLC FOR AUTHORITY TO CHANGE
WATER AND SEWER RATES

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BEFORE THE STATE OFFICE

COMMISSION
FILING CLERK

OF

ADMINISTRATIVE HEARINGS

LIBERTY UTILITIES (SILVERLEAF WATER) LLC'S
SECOND REQUEST FOR INFORMATION
TO HOLLY LAKE RANCH HOMEOWNERS ASSOCIATION

Liberty Utilities (Silverleaf Water) LLC ("Company") hereby serves its Second Request for Information on Holly Lake Ranch Homeowners Association pursuant to Commission Procedural Rules 22.141-.145, 16 Tex. Admin. Code Ch. 22.

Respectfully submitted,

SHAPIRO LAW FIRM, P.C.

By:

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and

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(Silverleaf Water) LLC

*Liberty Utilities (Silverleaf Water) LLC's
Second Request for Information to Holly Lake Ranch Homeowners Association*
SOAH Docket No. 473-18-3006.WS; PUC Docket No. 47976

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Certificate of Service

I, Whitney Birk, Paralegal to Jay L. Shapiro, certify that a copy of this document was served on November 2, 2018 by hand-delivery, facsimile, electronic mail and/or First Class Mail.


Whitney Birk

Definitions

1. “Company” or “Liberty Silverleaf” means Liberty Utilities (Silverleaf Water) LLC.
2. “Document” includes all written matter of every kind and description, whether draft or final, original or reproduction, including but not limited to, correspondence, memoranda, notes, transcripts, contracts, agreements, memoranda of telephone conversations or personal conversations, notices, reports, rules, regulations, facsimile messages, minutes of meetings, interoffice communications, tapes for visual or audio reproduction, drawings, graphs, charts, electronic mail message, and other compilations from which information can be obtained. The term “document” includes all copies of the document which contain any additional writing, underlining, notes, deletions, or any other markings or notations, or otherwise not identical copies of the original.
3. “DT” means direct testimony, filed October 5, 2018.
4. “HLRHA” means Holly Lake Ranch Homeowners Association and any person purporting to act on its behalf including, without limitation, attorneys, agents, advisors, representatives, employees or other persons.
5. “Identify” when used in referring to a person, shall mean to state the following with regard to the person: (a) name; (b) last known address; (c) residence and business telephone numbers; (d) relationship to you; and (e) occupation at the date of this RFI.
6. “Identify” and “identity” with respect to a document mean to state the name or title of the document, the type of document (e.g., letter, memorandum, telegram, computer input or output, chart, etc.), its date, the person(s) who authored it, the person(s) who signed it, the person(s) to whom it was addressed, the person(s) to whom it was sent, its general subject matter, its present location, and its present custodian. If any such document was in your or your witnesses’ possession or subject to your control, but is no longer, state what disposition was made of it and explain the circumstances surrounding, and the authorization for, such disposition, and state the date or approximate date of such disposition.

7. “List,” “describe,” “explain,” “specify” or “state” shall mean to set forth fully, in detail, and unambiguously each and every fact of which you have knowledge which is relevant to the answer called for by the RFI.
8. “RFI” means Request for Information.
9. “You” and “Your” refers to Holly Lake Ranch Homeowners Association as defined above.

Instructions

1. These instructions and definitions apply to this RFI. Unless otherwise clearly indicated within the context of a specific RFI herein, the definition of each term provided below applies whether the term is used or defined in the singular or plural.
2. Please start each response on a separate page and copy the request immediately above.
3. State the name of the witness in this proceeding who will sponsor the answer and who can vouch for the truth of the answer.
4. Please answer the following written questions fully and in writing, based on all information reasonably available to you at the time your response is made.
5. Please answer each question based upon your knowledge, information, or belief, and any answer that is based upon information or belief should be stated as such.
6. In instances where you choose to answer an RFI by referring to a specific document or record, please specify the same in sufficient detail so that Liberty Silverleaf may locate and identify the record or document.
7. If the response to any question is voluminous, please provide an index to the materials contained in the response.
8. 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, recipients or copies, subject matter of the document, and the basis upon which such privilege is claimed.

9. These questions are continuing in nature. You are under a continuing duty to supplement your answers to these RFIs if there is a change in circumstances or facts, or if you discover that they are no longer complete and correct. In such an instance, please supplement your response promptly after you discover the need for supplementation.

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SECOND REQUEST FOR INFORMATION TO
HOLLY LAKE RANCH HOMEOWNERS ASSOCIATION**

- LS 2.1** Following up the response to RFI LS 1.8, admit that the utility company not the development company was acquired by Algonquin. If you deny this request for admission, please state the basis for the denial with specificity.
- LS 2.2** Following up the response to RFI LS 1.8, please provide any factual support or legal authority for the proposition that Algonquin acquired or assumed obligations or liabilities of a developer of real property.
- LS 2.3** Following up the response to RFI LS 1.9, please provide any proof or other support that the Holly Lake Development Co. & Ascension Resorts, Ltd. actually paid for the cost of the utility infrastructure.
- LS 2.4** Is it the HLRHA position that Silverleaf Resorts, Inc. and Holly Lake Development Co. & Ascension Resorts, Ltd. are the same entity? Please explain your answer.