



Control Number: 48005



Item Number: 17

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APPLICATION OF NORTHSIDE
WATER SUPPLY CORPORATION
AND RED RIVER AUTHORITY OF
TEXAS FOR SALE, TRANSFER, OR
MERGER OF FACILITIES AND
CERTIFICATE RIGHTS IN
WILBARGER COUNTY

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PUBLIC UTILITY COMMISSION
OF TEXAS

PUBLIC UTILITY COMMISSION
FILING CLERK

**RED RIVER AUTHORITY'S RESPONSE TO COMMISSION STAFF'S SECOND
REQUEST FOR INFORMATION**

QUESTION NUMBERS STAFF 2-1 THROUGH 2-2

Red River Authority of Texas, provides the following responses to Questions Staff 2-1 through 2-2. The following responses were prepared under the direct supervision of **Randy Whiteman**, General Manager of Red River Authority, who is the sponsoring witness for the responses.

RESPONSES

- Staff 2-1** Reference Red River Authority's Response to Commission Staff's First Request for Information (RFI), filed on March 26, 2018. Provide plan approvals from the Texas Commission on Environmental Quality for the ongoing improvements at Red River's water treatment plants as identified in the response to Staff RFI 1-1.
- Response:** The plans outlined in Red River Authority's Response to Staff RFI 1-1 filed on March 26, 2018, were submitted to the Texas Commission on Environmental Quality on April 30, 2018. Red River Authority has not received a response from the TCEQ as of the date of this Response.
- Staff 2-2** Reference the Objection to Recommendation on Administrative Completeness and Proposed Notice and to Proposed Sale and Transfer, filed by the Wilbarger County Attorney on April 27, 2018. Admit or deny that Red River will be purchasing groundwater rights in Wilbarger County upon completion of the transaction that forms the basis of this Application for Sale, Transfer, or Merger of a Retail Public Utility filed with the Commission on January 31, 2018.
- Response:** Red River Authority denies that the acquisition of the assets of the Northside Water Supply Corporation as contemplated in the Application constitutes the purchase of groundwater rights. Reference is also made to Red River

Authority's Response to Objection of Wilbarger County, Texas filed on May 8, 2018.

Respectfully submitted,

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CERTIFICATE OF SERVICE

I certify that a copy of this document will be served on all parties of record on May 10, 2018, in accordance with 16 TAC §22.74.



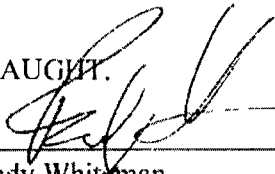
D. Todd Davenport

VERIFICATION

STATE OF TEXAS §
 §
COUNTY OF WICHITA §

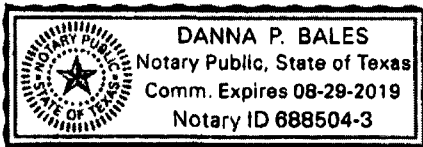
BEFORE ME, the undersigned authority, on this date personally appeared Randy Whiteman, General Manager of Red River Authority of Texas, who after being by me duly sworn, states on his oath, deposed and stated that he is duly competent and qualified to make this Verification from his own personal knowledge, information, and belief, and that he has read the foregoing answers and the averments thereof are true and correct and within his personal knowledge, information, and belief.

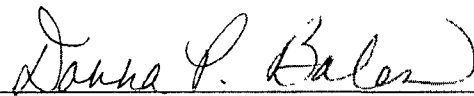
FURTHER AFFIANT SAYETH NAUGHT.



Randy Whiteman

Sworn to and subscribed before me this 9th day of May, 2018, by Randy Whiteman.





Notary Public in and for the State of Texas

My commission expires: