

Control Number: 48746



Item Number: 19

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DOCKET NO. 48746

APPLICATION OF THE CITY OF
MARSHALL TO AMEND ITS WATER
CERTIFICATE OF CONVENIENCE
AND NECESSITY IN HARRISON
COUNTY

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§
§

PUBLIC UTILITY COMMISSION

2019 SEP 27 11 28 AM
PUBLIC UTILITY COMMISSION
OF TEXAS
FILING CLERK

**COMMISSION STAFF'S FIRST REQUEST FOR INFORMATION
TO CITY OF MARSHALL
QUESTION NOS. STAFF 1-1 THROUGH STAFF 1-3**

Pursuant to 16 Texas Administrative Code (TAC) § 22.144, the Staff (Staff) of the Public Utility Commission of Texas (Commission) requests that the City of Marshall (Marshall) 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.

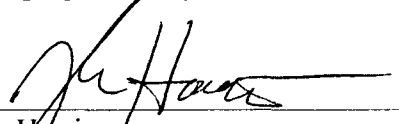
Dated: September 27, 2019

Respectfully submitted,

**PUBLIC UTILITY COMMISSION OF TEXAS
LEGAL DIVISION**

Margaret Uhlig Pemberton
Division Director

Rachelle Nicolette Robles
Managing Attorney

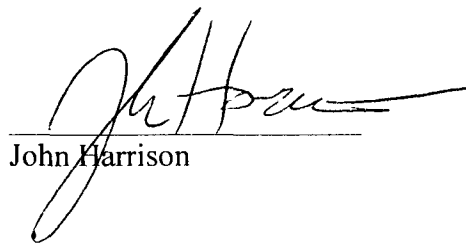


John Harrison
State Bar No. 24097806
1701 N. Congress Avenue
P.O. Box 13326
Austin, Texas 78711-3326
(512) 936-7277
(512) 936-7268 (facsimile)
John.Harrison@puc.texas.gov

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CERTIFICATE OF SERVICE

I certify that a copy of this document will be served on all parties of record on September 27, 2019, in accordance with 16 TAC § 22.74.



John Harrison

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**COMMISSION STAFF'S FIRST REQUEST FOR INFORMATION
TO CITY OF MARSHALL
QUESTION NOS. STAFF 1-1 THROUGH STAFF 1-3**

DEFINITIONS

- A. "The City of Marshall," "Marshall," or "the city," refer to the City of Marshall and any person acting or purporting to act on its 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 utility'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 exist and these documents will be provided.

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**COMMISSION STAFF'S FIRST REQUEST FOR INFORMATION
TO CITY OF MARSHALL
QUESTION NOS. STAFF 1-1 THROUGH STAFF 1-3**

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 FIRST REQUEST FOR INFORMATION
TO CITY OF MARSHALL
QUESTION NOS. STAFF 1-1 THROUGH STAFF 1-3**

- Staff 1-1** Please provide a detailed map(s) identifying the location of all the following items:
- a) Boundary of City of Marshall existing water/sewer CCN No. 11064;
 - b) Boundary of the requested areas in the current docket;
 - c) Boundaries of city limits and extraterritorial jurisdiction;
 - d) Potential customers requesting service within the requested areas; and
 - e) Existing customers within the requested area.

- Staff 1-2** Please provide a detailed map, separate than that requested in Staff 1-1, identifying the location of the following items:
- a) Existing water or sewer facilities for production, transmission, distribution, collection, and treatment within the boundaries of the existing CCN;
 - b) Existing water or sewer facilities for production, transmission, distribution, collection, and treatment within the boundaries of the requested areas;
 - c) Proposed water or sewer facilities for production, transmission, distribution, collection, and treatment within the boundaries of the existing CCN; and
 - d) Proposed water or sewer facilities for production, transmission, distribution, collection, and treatment within the boundaries of the requested areas;

Note: Facilities should be identified on subdivision plats, engineering planning maps, or detailed maps.

Please use color coding to distinguish different types of facilities and boundaries.

- Staff 1-3** Please provide a copy of each map that City of Marshall used to respond to Staff 1-1 and Staff 1-2 in the following forms:
- a) Hard copy, full-sized, and rendered to scale; and
 - b) Electronically file a copy, in an Adobe PDF file format, to the Commission Interchange Filer.