



Control Number: 48746



Item Number: 32

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**DOCKET NO. 48746**

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

**§ PUBLIC UTILITY COMMISSION  
§ OF TEXAS  
§**

PUBLIC UTILITY COMMISSION  
FILING CLERK

**COMMISSION STAFF'S SECOND REQUEST FOR INFORMATION  
TO CITY OF MARSHALL  
QUESTION NOS. STAFF 3-1 THROUGH STAFF 3-6**

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: February 19, 2020**

Respectfully submitted,

**PUBLIC UTILITY COMMISSION OF TEXAS  
LEGAL DIVISION**

Thomas S. Hunter  
Division Director

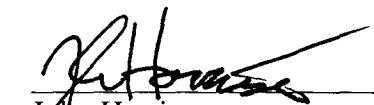
Rachelle Nicolette Robles  
Managing Attorney

  
\_\_\_\_\_  
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 February 19, 2020 in accordance with 16 TAC § 22.74.

  
\_\_\_\_\_  
John Harrison

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**COMMISSION STAFF'S SECOND REQUEST FOR INFORMATION  
TO CITY OF MARSHALL  
QUESTION NOS. STAFF 3-1 THROUGH STAFF 3-6**

**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 SECOND REQUEST FOR INFORMATION  
TO CITY OF MARSHALL  
QUESTION NOS. STAFF 3-1 THROUGH STAFF 3-6**

**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 SECOND REQUEST FOR INFORMATION  
TO CITY OF MARSHALL  
QUESTION NOS. STAFF 3-1 THROUGH STAFF 3-6**

- Staff 3-1** Please provide the acreage of the requested area that is located:
- a) within the municipal boundaries
  - b) within the extraterritorial jurisdiction
  - c) outside of the extraterritorial jurisdiction
- Staff 3-2** Please provide documentation that supports the requests for service keyed as “prospective customers” in the map provided in response to Staff’s First Request for Information (item number 20 in AIS) in the requested area such as applications for service, developer agreements, or written inquiries requesting utility service.
- Staff 3-3** Please provide the number of customers located in the requested area, excluding any customers that are located within the existing CCN.
- Staff 3-4** Please provide the acreage for the requests for service provided in response to Staff’s Second Request for Information (item number 25 in AIS).
- Staff 3-5** Please clarify if the requested area located outside the municipal boundaries has existing utility customers.
- Staff 3-6** Please clarify if the requested area has an immediate need for service.