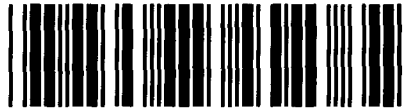




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DOCKET NO. 49097

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APPLICATION OF CITY OF LORENA, §
SPRING VALLEY WATER SUPPLY §
CORPORATION, AND CITY OF WACO §
FOR APPROVAL OF A SERVICE AREA §
CONTRACT UNDER TEXAS WATER §
CODE § 13.248 AND TO AMEND A §
CERTIFICATE OF CONVENIENCE §
AND NECESSITY IN MCLENNAN §
COUNTY §

PUBLIC UTILITY COMMISSION
PUBLIC UTILITY COMMISSION
FILING CLERK
OF TEXAS

**COMMISSION STAFF'S FIRST REQUEST FOR INFORMATION AND REQUEST
FOR ADMISSION TO SPRING VALLEY WATER
SUPPLY CORPORATION (SPRING VALLEY WSC)
QUESTION NOS. STAFF 1-1 THROUGH 1-17**

Pursuant to 16 Texas Administrative Code (TAC) § 22.144, the Commission Staff of the Public Utility Commission of Texas (Commission) requests that the Spring Valley Water Supply Corporation (Spring Valley WSC), by and through their attorneys of record, provide the following information and answer the following question(s) under oath. The questions 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 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. 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 78712-3326.

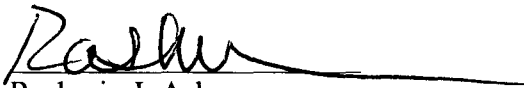
Dated: February 4, 2019

Respectfully Submitted,

**PUBLIC UTILITY COMMISSION OF TEXAS
LEGAL DIVISION**

Margaret Uhlig Pemberton
Division Director

Karen S. Hubbard
Managing Attorney



Rashmin J. Asher
State Bar No. 24092058
1701 N. Congress Avenue
P.O. Box 13326
Austin, Texas 78711-3326
(512) 936-7216
(512) 936-7268 (facsimile)
Rashmin.Asher@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 4, 2019, in accordance with 16 TAC § 22.74.



Rashmin J. Asher

DOCKET NO. 49097

**COMMISSION STAFF'S FIRST REQUEST FOR INFORMATION AND REQUEST
FOR ADMISSION TO SPRING VALLEY WATER
SUPPLY CORPORATION (SPRING VALLEY WSC)
QUESTION NOS. STAFF 1-1 THROUGH 1-17**

DEFINITIONS

- 1) "Spring Valley WSC", "the Company" or "you" refers to the Spring Valley Water Supply Corporation 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 exist and these documents will be provided.

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**COMMISSION STAFF'S FIRST REQUEST FOR INFORMATION AND REQUEST
FOR ADMISSION TO SPRING VALLEY WATER
SUPPLY CORPORATION (SPRING VALLEY WSC)
QUESTION NOS. STAFF 1-1 THROUGH 1-17**

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.

DOCKET NO. 49097

**COMMISSION STAFF'S FIRST REQUEST FOR INFORMATION AND REQUEST
FOR ADMISSION TO SPRING VALLEY WATER
SUPPLY CORPORATION (SPRING VALLEY WSC)
QUESTION NOS. STAFF 1-1 THROUGH 1-17**

- Staff 1-1 Please provide a list of customers and connections outside of Spring Valley Water Supply Corporation's certificate of convenience and necessity (CCN) service area receiving water service by the Spring Valley Water Supply Corporation (WSC).
- Staff 1-2 Please provide a list of connections, inside Spring Valley WSC's CCN service area, not receiving water service by Spring Valley WSC.
- Staff 1-3 Please provide documents regarding requests for provision of water service inside Spring Valley WSC's CCN Service Area.
- Staff 1-4 Please provide a detailed schematic showing the location and size of any facilities for production, transmission, distribution, and service connections currently being served by the Spring Valley WSC within its CNN service area. Facilities should be identified on subdivision plats, engineering planning maps, or other large scale maps. Facilities should include line size and metered connections.
- Staff 1-5 Please provide a detailed schematic showing the location and size of any facilities for production, transmission, distribution, and service connections currently being served by the Spring Valley WSC outside its CNN service area. Facilities should be identified on subdivision plats, engineering planning maps, or other large scale maps. Facilities should include line size and metered connections.
- Staff 1-6 Please state the number of connections being served by Spring Valley WSC inside its CCN boundaries.
- Staff 1-7 Please state the number of connections being served by Spring Valley WSC outside its CCN boundaries.
- Staff 1-8 Please provide an accounting of the Spring Valley WSC present water capacity. Please detail all sources of water and any legal arrangements pertaining thereto.
- Staff 1-9 Please provide any documents regarding agreements between City of Lorena and Spring Valley WSC about water service, including applicable boundaries of agreed upon service areas.
- Staff 1-10 Please provide all of the Spring Valley WSC policies, ordinances, and regulations regarding retail water service requests, including non-standard service requests.

- Staff 1-11 Please provide a current detailed and general location map showing Spring Valley WSC existing CCN service area.
- Staff 1-12 Please provide a current detailed map showing properties served by Spring Valley WSC outside of Spring Valley WSC CCN service area.
- Staff 1-13 Please provide a current detailed map showing properties inside of Spring Valley WSC CCN service area not served by Spring Valley WSC.
- Staff 1-14 Please provide a current detailed map showing properties served by Spring Valley WSC in the area generally bounded on the north by Mitchell Road; on the east by Country Place Road; on the south by Pilgrim Road; and on the west by Southern View Road.
- Staff 1-15 Admit or Deny: Spring Valley WSC provides water service to property labeled Strahan Judy K in Attachment D to the petition.¹
- Staff 1-16 Admit or Deny: Spring Valley WSC provides water service to property labeled Polk Erma J in Attachment D to the petition.²
- Staff 1-17 Admit or Deny: Spring Valley WSC provides water service to property labeled DMDC LLC shown in Attachment D to the petition.³

¹ See Docket No. 49097, Item No. 1, *Petition by City of Lorena, Spring Valley Water Supply Corporation, and City of Waco for Approval and Enforcement of Agreement Designating Service Area Under Texas Water Code § 13.248 in McLennan County*, at 41.

² *Id.*

³ *Id.*