

Control Number: 49269



Item Number: 21

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PUC DOCKET NO. 49269

APPLICATION OF JACKSON WATER	§	PUBLIC UTILITY COMMISSION
SUPPLY CORPORATION TO AMEND A	§	
WATER CERTIFICATE OF	§	OF TEXAS
CONVENIENCE AND NECESSITY IN	§	
SMITH COUNTY	§	

**COMMISSION STAFF'S FIRST REQUEST FOR INFORMATION
TO JACKSON WATER SUPPLY CORPORATION
QUESTION NOS. STAFF 1-1 THROUGH 1-5**

Pursuant to 16 Texas Administrative Code (TAC) § 22.144 of the Commission's Procedural Rules, the Staff of the Public Utility Commission of Texas (Staff) requests that Jackson Water Supply Corporation by and through its authorized representative, 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: November 21, 2019

Respectfully submitted,

**PUBLIC UTILITY COMMISSION OF TEXAS
LEGAL DIVISION**

Margaret Uhlig Pemberton
Division Director

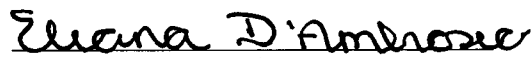
Karen S. Hubbard
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**PUC DOCKET NO. 49269
CERTIFICATE OF SERVICE**

I certify that a copy of this document will be served on all parties of record on November 21, 2019 in accordance with 16 TAC § 22.74.



Eleanor D'Ambrosio

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**COMMISSION STAFF'S FIRST REQUEST FOR INFORMATION
TO JACKSON WATER SUPPLY CORPORATION
QUESTION NOS. STAFF 1-1 THROUGH 1-5**

DEFINITIONS

- 1) "Jackson WSC," "Company" or "you" refers to the Jackson 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
TO JACKSON WATER SUPPLY CORPORATION
QUESTION NOS. STAFF 1-1 THROUGH 1-5**

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 JACKSON WATER SUPPLY CORPORATION
QUESTION NOS. STAFF 1-1 THROUGH 1-5**

Staff 1-1 Please provide a detailed map(s) identifying the location of all the following items:

- a. Boundary of Jackson WSC's existing water CCN No. 10763;
- 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 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 Jackson WSC uses to respond to RFI 1 and 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.

Staff 1-4 Provide any requests for service to support the need for service in the requested area.

Staff 1-5 Provide construction approval letter(s) from the Texas Commission on Environmental Quality (TCEQ) for any facilities that are necessary to provide service in the requested area. This includes any upgrades to the existing water plant and the construction of distribution system(s). If facility plans have been submitted to TCEQ, but not yet approved, please provide documents demonstrating when the plans were submitted.