

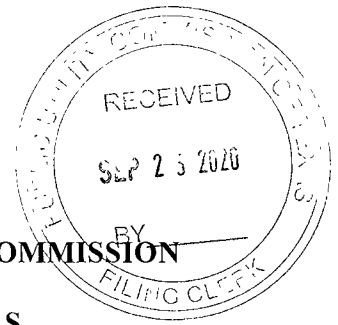


Control Number: 49277



Item Number: 45

Addendum StartPage: 0



**DOCKET NO. 49277**

**APPLICATION OF THE CITY OF  
FORT WORTH FOR A SEWER  
CERTIFICATE OF CONVENIENCE  
AND NECESSITY IN TARRANT,  
DENTON, WISE AND PARKER  
COUNTIES**

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**PUBLIC UTILITY COMMISSION**

**OF TEXAS**

**COMMISSION STAFF'S FIRST REQUEST FOR INFORMATION TO THE CITY OF  
FORT WORTH  
QUESTION NOS. STAFF 1-1 THROUGH STAFF 1-7**

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 The City of Fort Worth (Fort Worth) by and through its attorney 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 responses to the Requests for Information by filing with the Commission solely through the Interchange on the Commission's website and provide notice, by email, to all other parties that the pleading or document has been filed with the Commission, unless otherwise ordered by the presiding officer pursuant to the Order Suspending Rules in Docket No. 50664.

Dated: September 25, 2020

Respectfully submitted,

**PUBLIC UTILITY COMMISSION OF TEXAS  
LEGAL DIVISION**

Rachelle Nicolette Robles  
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/s/ Rustin Tawater  
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**DOCKET NO. 49277**

**CERTIFICATE OF SERVICE**

I certify that, unless otherwise ordered by the presiding officer, notice of the filing of this document was provided to all parties of record via electronic mail on September 25, 2020, in accordance with the Order Suspending Rules, issued in Project No. 50664.

/s/ Rustin Tawater  
Rustin Tawater

**DOCKET NO. 49277**

<b>APPLICATION OF THE CITY OF</b>	<b>§</b>	<b>PUBLIC UTILITY COMMISSION</b>
<b>FORT WORTH FOR A SEWER</b>	<b>§</b>	
<b>CERTIFICATE OF CONVENIENCE</b>	<b>§</b>	<b>OF TEXAS</b>
<b>AND NECESSITY IN TARRANT,</b>	<b>§</b>	
<b>DENTON, WISE AND PARKER</b>	<b>§</b>	
<b>COUNTIES</b>	<b>§</b>	

**COMMISSION STAFF'S FIRST REQUEST FOR INFORMATION TO THE CITY OF  
FORT WORTH  
QUESTION NOS. STAFF 1-1 THROUGH STAFF 1-7**

**DEFINITIONS**

- 1) "The City of Fort worth" "Company" or "you" refers to The City of Fort Worth 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.

**DOCKET NO. 49277**

**COMMISSION STAFF'S FIRST REQUEST FOR INFORMATION TO THE CITY OF  
FORT WORTH  
QUESTION NOS. STAFF 1-1 THROUGH STAFF 1-7**

**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. 49277**

**COMMISSION STAFF'S FIRST REQUEST FOR INFORMATION TO THE CITY OF  
FORT WORTH  
QUESTION NOS. STAFF 1-1 THROUGH STAFF 1-7**

- Staff 1-1 Please provide updated requested acreage and current customer connection count for each of the requested areas.
- Staff 1-2 Please provide a map that shows the location of the customers receiving service identified by parcel in the requested areas. Also, include the current and proposed CCN boundaries. Please show the roads in a different color than the outer boundary of the parcel boundaries.
- Staff 1-3 Please provide the parcel acreage held by the current customer connections in the requested areas. For this portion of the requested area please also provide the total acreages for the following:
- a. Acreage inside city limits
  - b. Acreage inside ETJ
  - c. Acreage outside the city limits and ETJ
- Staff 1-4 Please provide the parcel acreage held by landowners requesting service in the requested areas. For this portion of the requested area please also provide the total acreages for the following:
- a. Acreage inside city limits
  - b. Acreage inside ETJ
  - c. Acreage outside the city limits and ETJ
- Staff 1-5 Please provide the parcel acreage where there are no requests for service and no current customers. For this portion of the requested area please also provide the total acreages for the following:
- a. Acreage inside city limits
  - b. Acreage inside ETJ
  - c. Acreage outside the city limits and ETJ
- Staff 1-6 Please provide a map showing the facility lines within the requested area and along with the requested area, the current city limit and ETJ boundaries that includes the locations of current customer connections and requests for service in the requested area.
- Staff 1-7 Please provide a map showing the boundaries of the requested area, and the current city limit and ETJ boundaries. Also provide the connection count and acreage (by parcel) for each of the following:
- a. The area within the city limits;

- b. The area within the ETJ; and
- c. The area outside the city limits and ETJ.

Please provide a copy of each map that the Applicant uses to respond to the items requested above in an Adobe PDF file format. Electronically file a copy of each map to the Commission Interchange Filer and email to [CentralRecords@puc.texas.gov](mailto:CentralRecords@puc.texas.gov).