



Control Number: 49277



Item Number: 54

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

§
§
§
§
§
§

BEFORE THE
PUBLIC UTILITY COMMISSION
OF TEXAS

**CITY OF FORT WORTH'S RESPONSE TO
COMMISSION STAFF'S FIRST REQUEST FOR INFORMATION**

Pursuant to 16 Texas Administrative Code ("TAC") § 22.144, comes now the City of Fort Worth ("City"), by and through its undersigned attorneys of record, and files this Response to Commission Staff's First Request for Information ("RFI"). The City received the RFI on September 25, 2020. On October 8, 2020, the City filed its Notice of Rule 11 Agreement, advising the Administrative Law Judge of an agreement between the City and Staff of the Public Utility Commission of Texas to extend the deadline for the City to file its response to the RFI to November 16, 2020. Therefore, this Response is timely filed. Pursuant to 16 TAC § 22.144(c)(2)(F), the City stipulates that this Response may be treated by all parties as if the answers were filed under oath.

54

Respectfully submitted,

**LLOYD GOSSELINK ROCHELLE &
TOWNSEND, P.C.**

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Austin, Texas 78701
(512) 322-5800
(512) 472-0532 (Fax)

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**ATTORNEYS FOR THE CITY OF FORT
WORTH**

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 November 16, 2020, in accordance with the Order Suspending Rules, issued in Project No. 50664.


MARIS M. CHAMBERS

CITY OF FORT WORTH'S RESPONSE TO COMMISSION STAFF'S FIRST RFI

STAFF 1-1: Please provide updated requested acreage and current customer connection count for each of the requested areas.

RESPONSE:	Requested Area	Updated Requested Acreage	Current Customer Connection Count
	Area 1, Polygon A	2,900.168715	0
	Area 1, Polygon B	455.112039	0
	Area 2, Polygon C	915.949034	0
	Area 2, Polygon D	193.179712	0
	Area 2, Polygon E	438.101466	0
	Area 3, Polygon F	9,123.267547	0
	Area 3, Polygon G	9,887.16718	0
	Area 3, Polygon H	674.597239	0
	Area 3, Polygon I	305.803728	0
	Area 4, Polygon J	41.297746	0
	Area 4, Polygon K	30.875947	0
	Area 4, Polygon L	126.575666	0
	Area 4, Polygon M	32.396344	0
	Area 5, Polygon N	328.36964	0
	Total	25,452.862	0

Prepared by: Maris Chambers, Wade Goodman
Sponsored by: Wade Goodman

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.

RESPONSE: See the maps included in Attachment A, attached hereto and incorporated herein for all purposes. Please note, because there are no customers receiving service in the requested areas, there are no such locations to identify by parcel on the maps included in Attachment A.

Prepared by: Maris Chambers, Wade Goodman
Sponsored by: Wade Goodman

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

RESPONSE: The parcel acreage held by the current customer connections in the requested areas is 0 acres.

For this portion of the requested area, the total acreage inside City limits is 0 acres.

For this portion of the requested area, the total acreage inside the City's extraterritorial jurisdiction ("ETJ") is 0 acres.

For this portion of the requested area, the total acreage outside City limits and ETJ is 0 acres.

Prepared by: Maris Chambers, Wade Goodman
Sponsored by: Wade Goodman

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

RESPONSE: The parcel acreage held by landowners requesting service in the requested areas is 0 acres.

For this portion of the requested area, the total acreage inside City limits is 0 acres.

For this portion of the requested area, the total acreage inside the City's ETJ is 0 acres.

For this portion of the requested area, the total acreage outside the City limits and ETJ is 0 acres.

Prepared by: Maris Chambers, Wade Goodman
Sponsored by: Wade Goodman

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

RESPONSE: The parcel acreage where there are no requests for service and no current customers in the requested areas is 25,452.862 acres.

For this portion of the requested area, the total acreage inside City limits is 0 acres.

For this portion of the requested area, the total acreage inside the City's ETJ is 25,452.862 acres.

For this portion of the requested area, the total acreage outside the City limits and ETJ is 0 acres.

Prepared by: Maris Chambers, Wade Goodman
Sponsored by: Wade Goodman

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.

RESPONSE: See the maps included in Attachment B, attached hereto and incorporated herein for all purposes. Please note, because there are no current customer connections or requests for service in the requested areas, there are no such locations to identify on the maps included in Attachment B.

Prepared by: Maris Chambers, Wade Goodman
Sponsored by: Wade Goodman

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. Acreage inside city limits
- b. Acreage inside ETJ
- c. Acreage outside the city limits and ETJ

RESPONSE: Maps showing the boundaries of the requested area, and the current city limit and ETJ boundaries are provided in Attachment C, attached hereto and incorporated herein for all purposes.

The connection count in the requested areas inside City limits is 0. The acreage (by parcel) in the requested areas inside City limits is 0 acres.

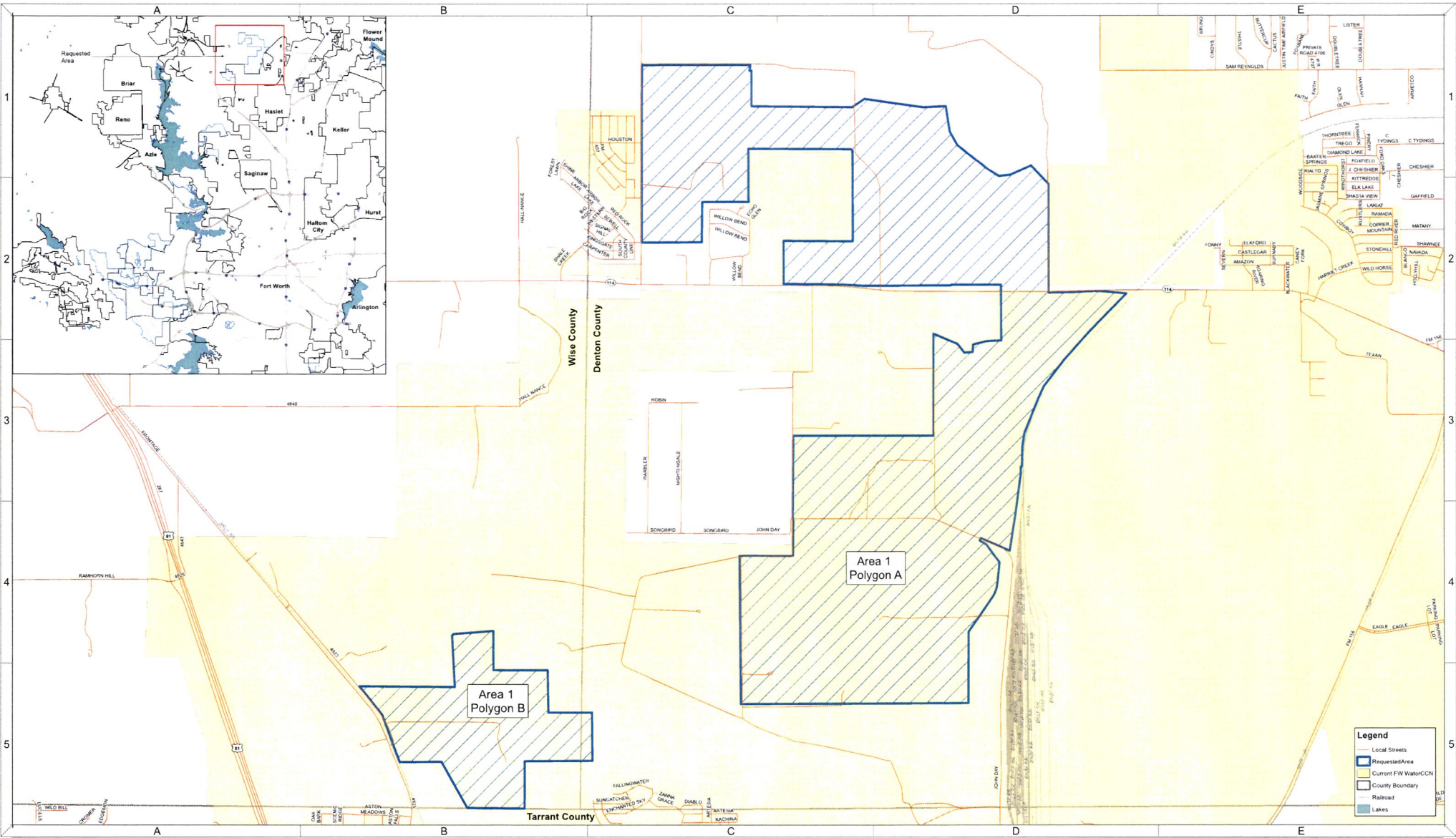
The connection count and acreage (by parcel) in the requested areas inside the City's ETJ is provided in RESPONSE 1-1, above.

The connection count in the requested areas outside the City limits and ETJ is 0. The acreage (by parcel) in the requested areas outside the City limits and ETJ is 0 acres.

Prepared by: Maris Chambers, Wade Goodman
Sponsored by: Wade Goodman

Attachment A

Maps in Response to Staff's RFI No. 1-2

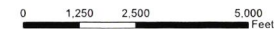


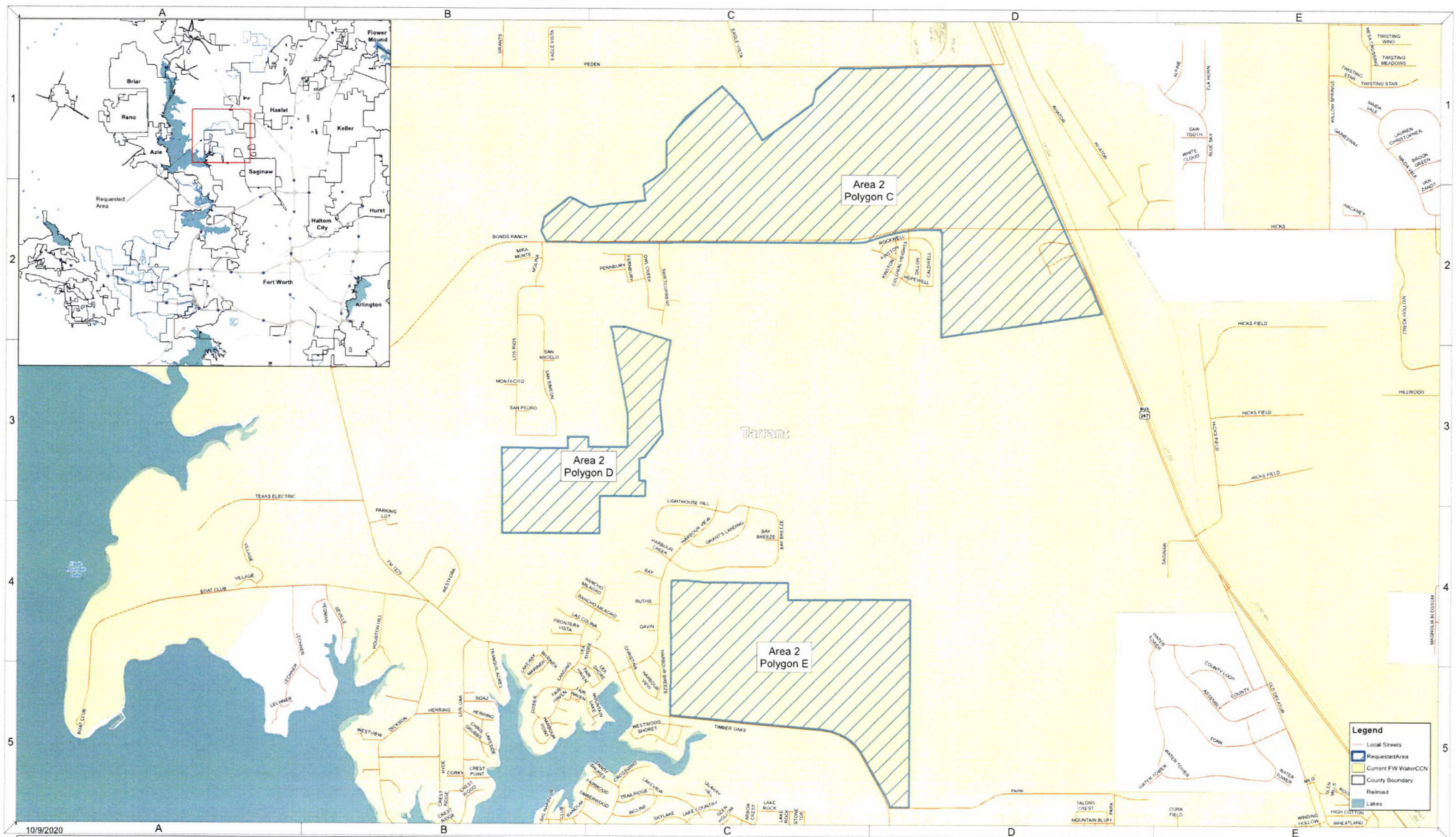
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Large Scale Map Fort Worth Water Proposed Amendment to CCN Area 1





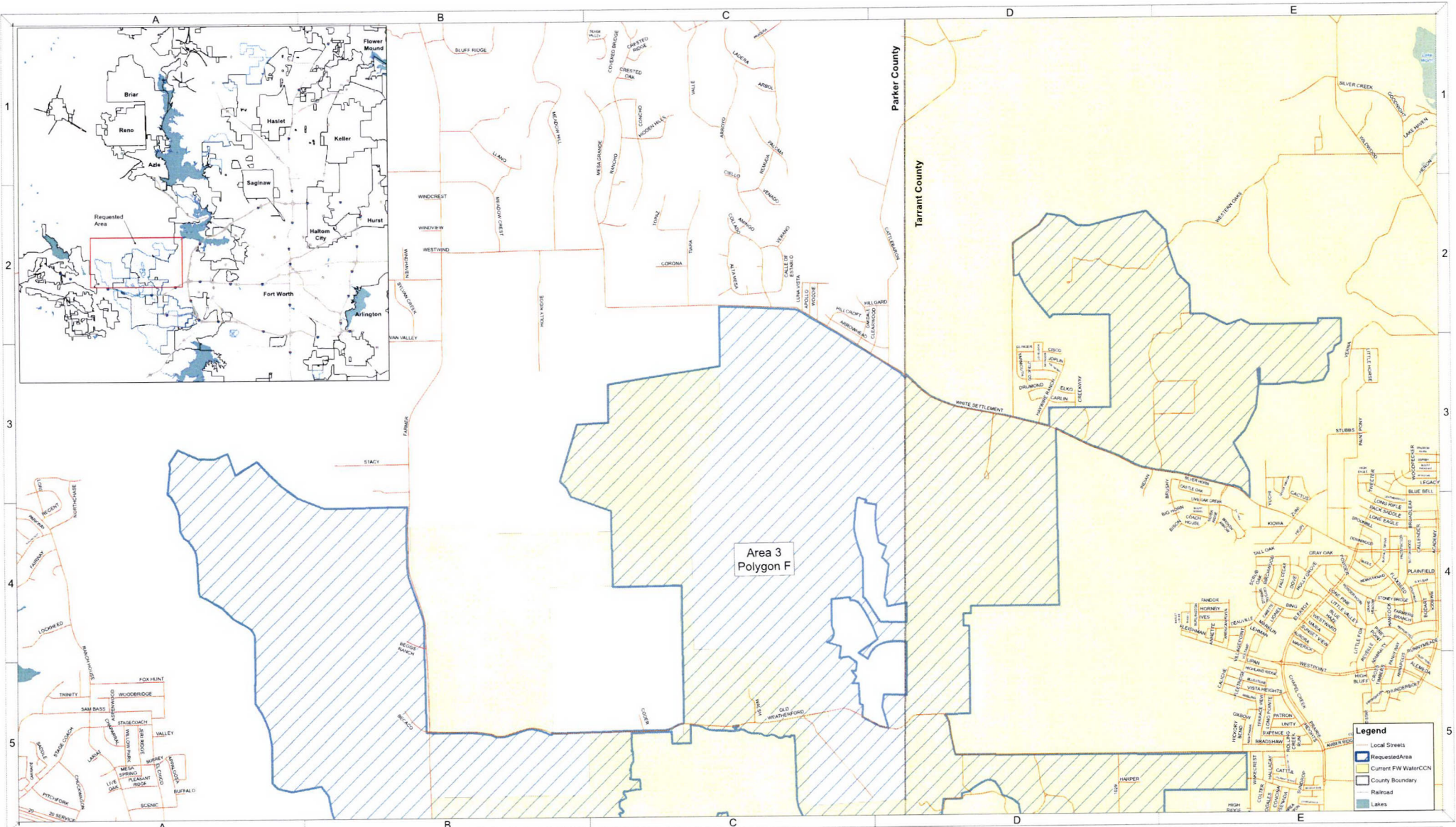
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Large Scale Map Fort Worth Water Proposed Amendment to CCN Area 2





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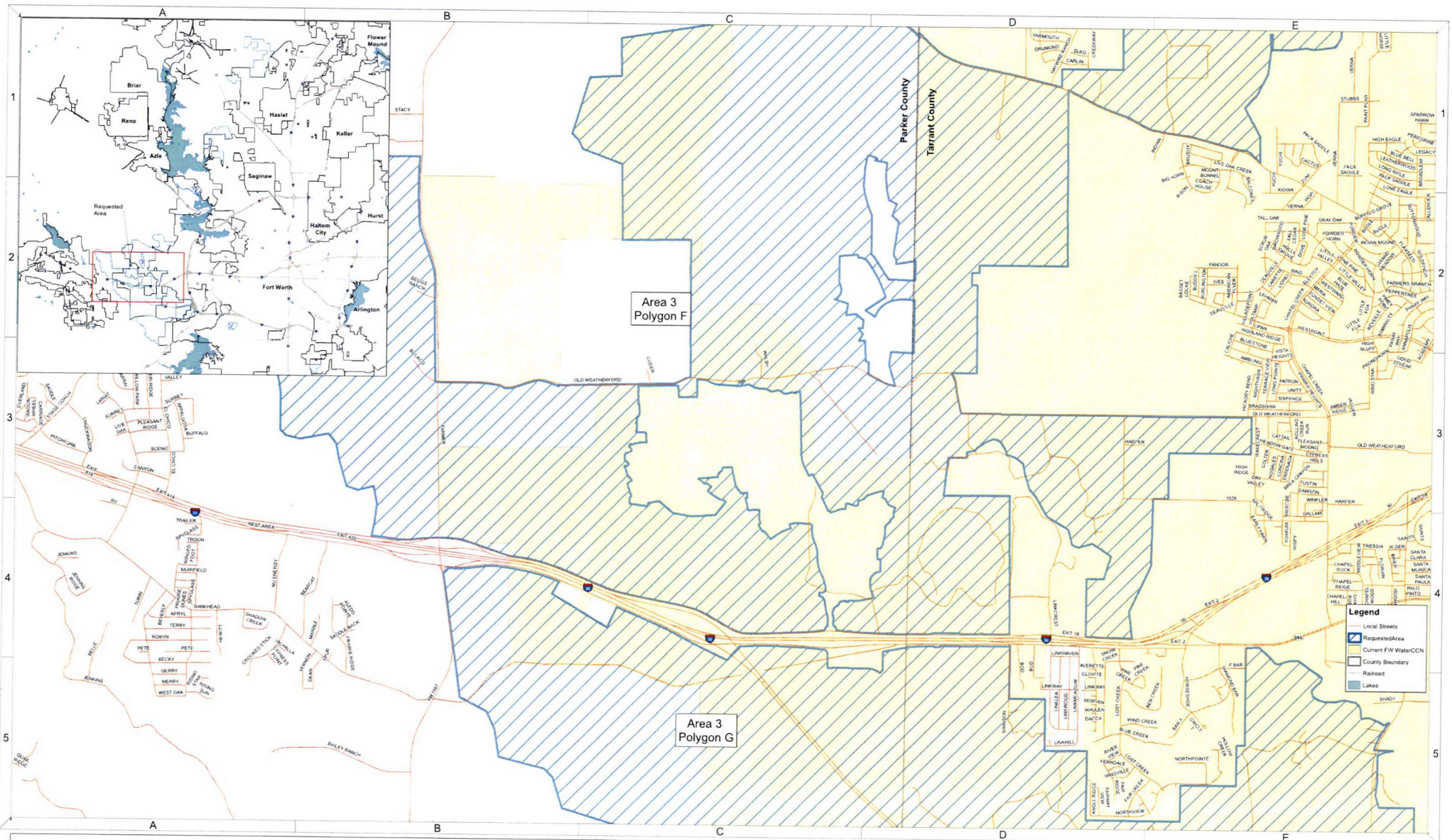
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Large Scale Map Fort Worth Water Proposed Amendment to CCN Area 3



0 1,300 2,600 5,200 Feet





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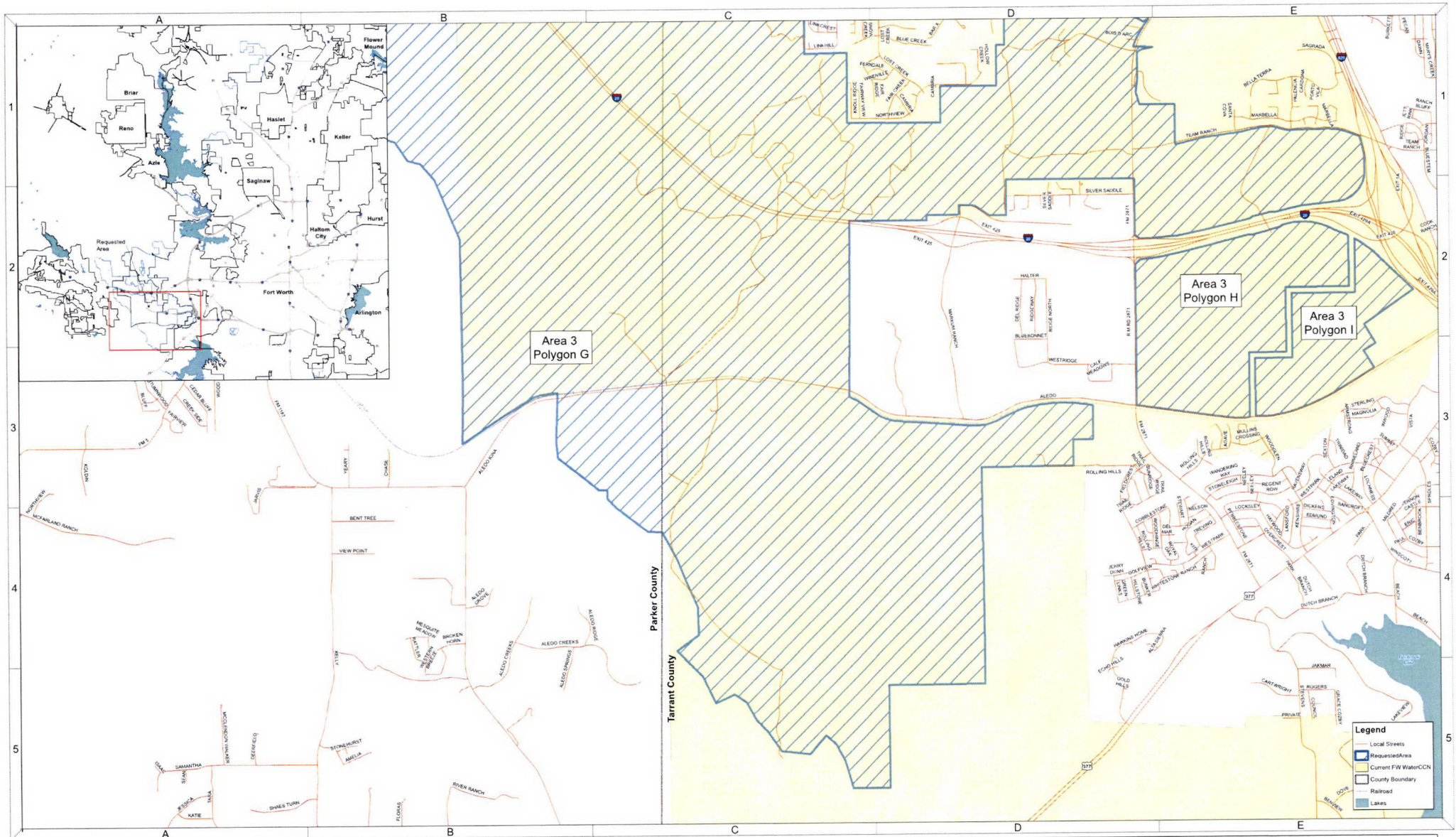
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Large Scale Map Fort Worth Water Proposed Amendment to CCN Area 3B



0 1,300 2,600 5,200 Feet





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Large Scale Map Fort Worth Water Proposed Amendment to CCN Area 3C



0 1,300 2,600 5,200 Feet

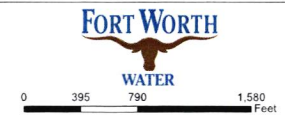


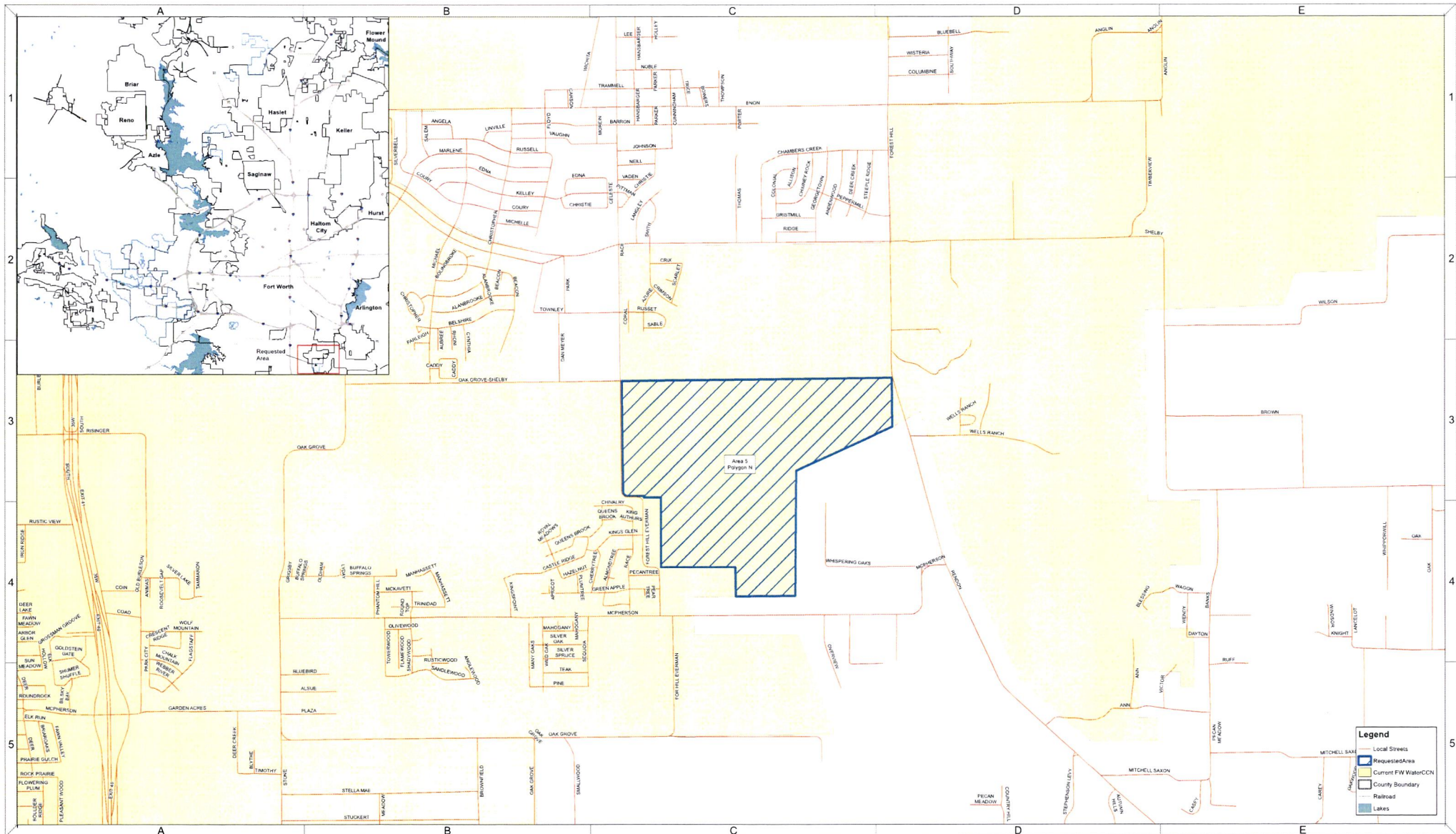


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Large Scale Map Fort Worth Water Proposed Amendment to CCN Area 4





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Large Scale Map Fort Worth Water Proposed Amendment to CCN Area 5

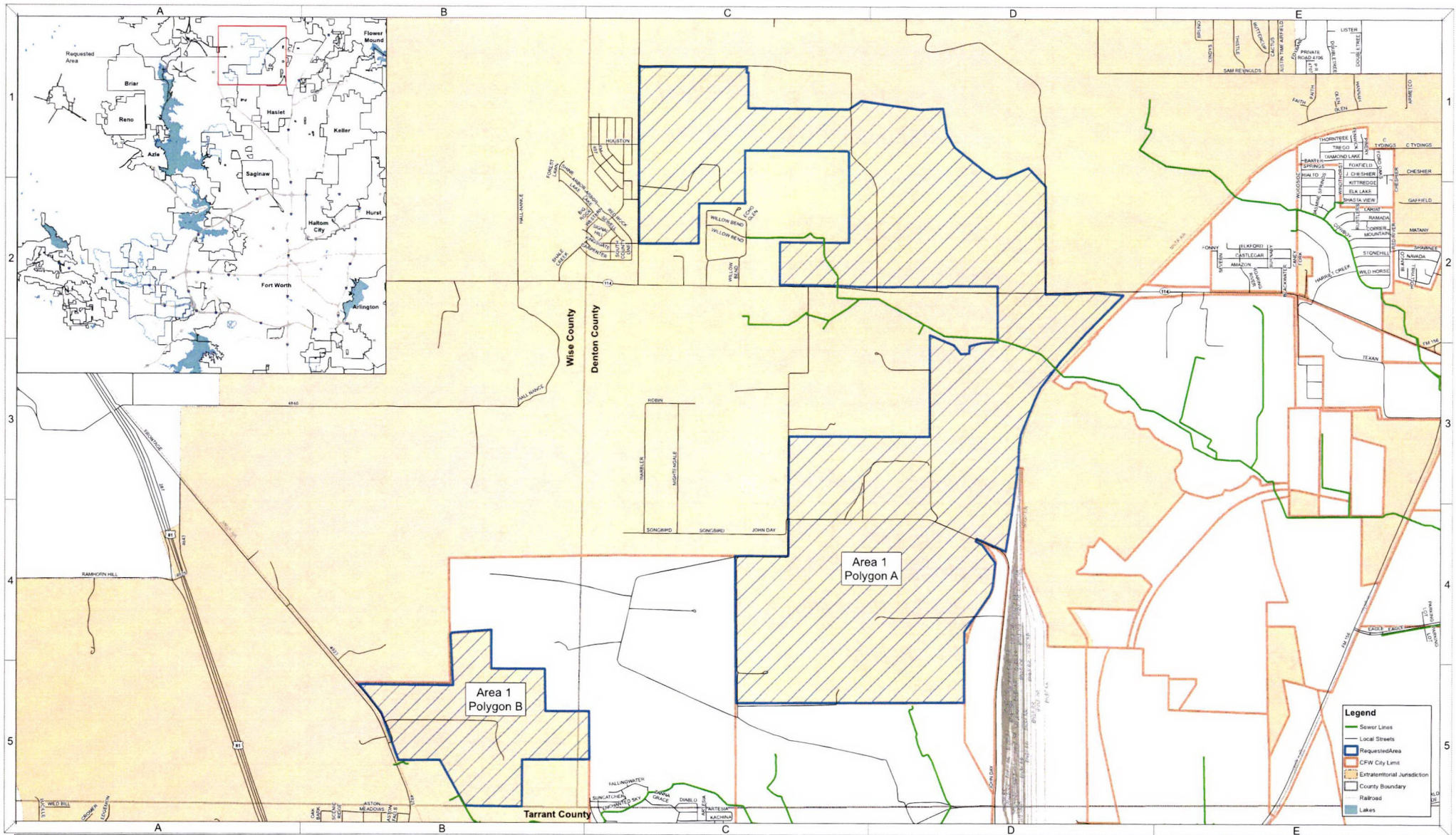
FORT WORTH
WATER

0 750 1,500 3,000
Feet



Attachment B

Maps in Response to Staff's RFI No. 1-6



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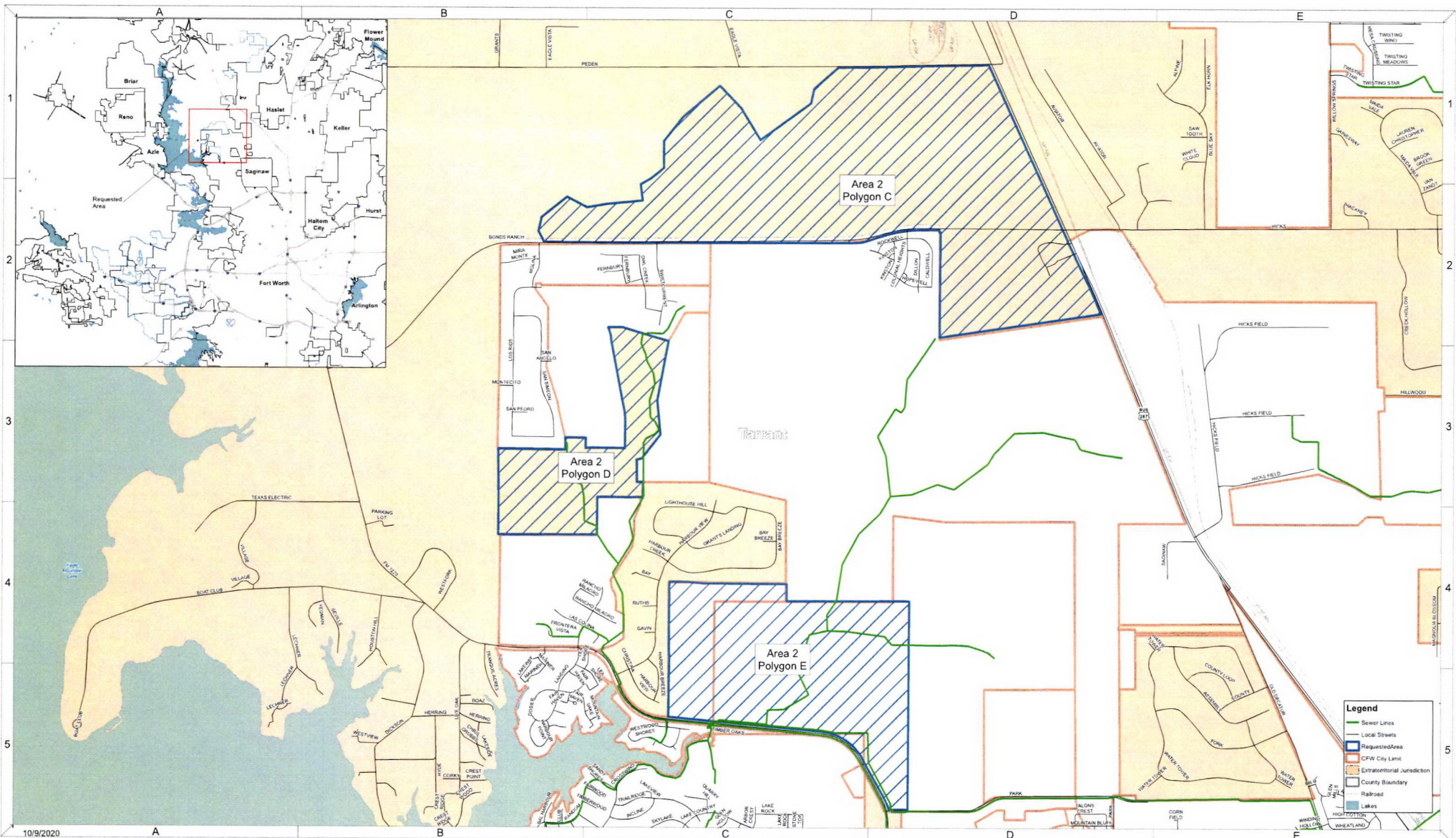
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Large Scale Map Fort Worth Water Proposed Amendment to CCN Area 1



0 1,250 2,500 5,000
Feet



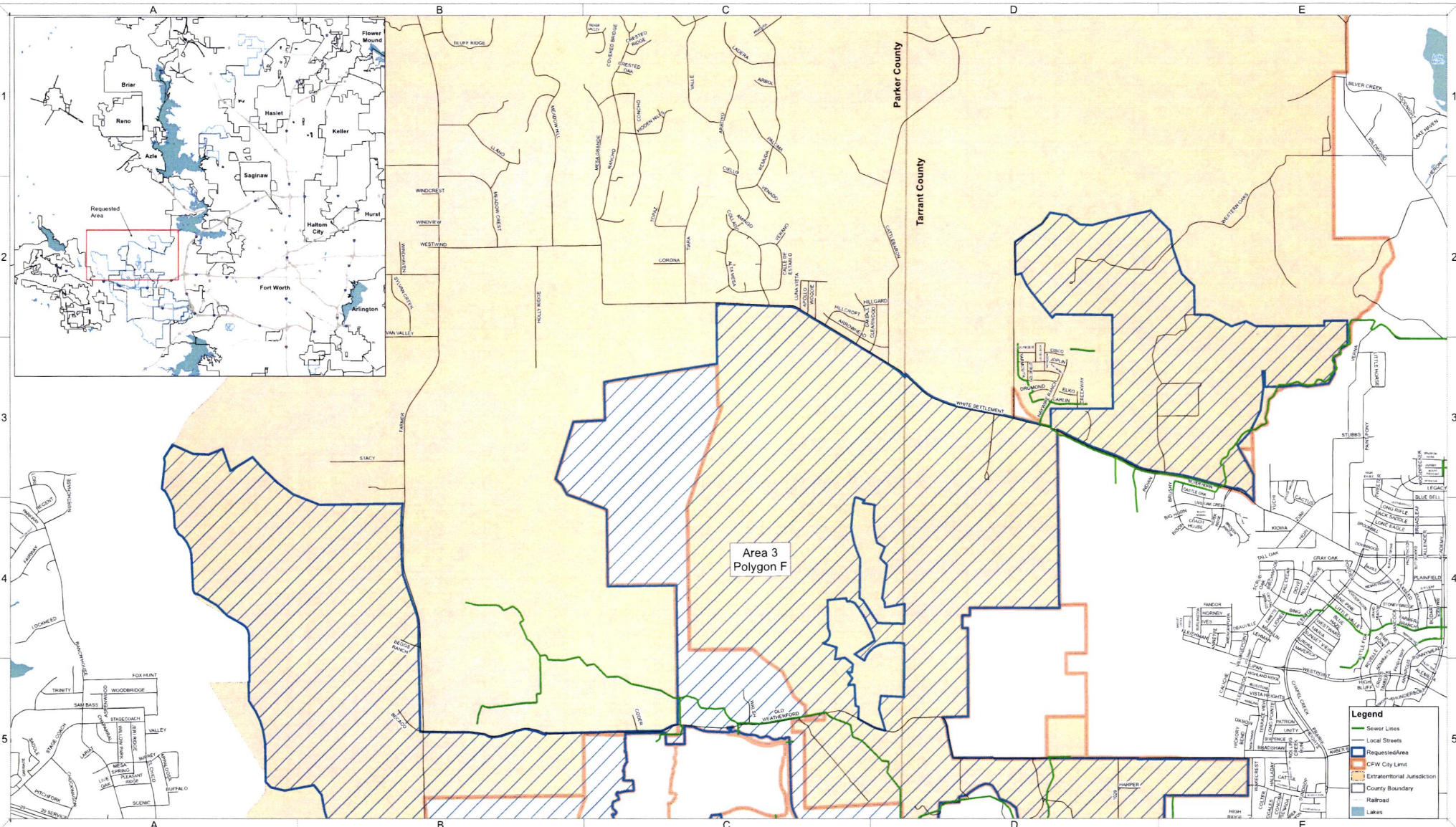


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Large Scale Map Fort Worth Water Proposed Amendment to CCN Area 2





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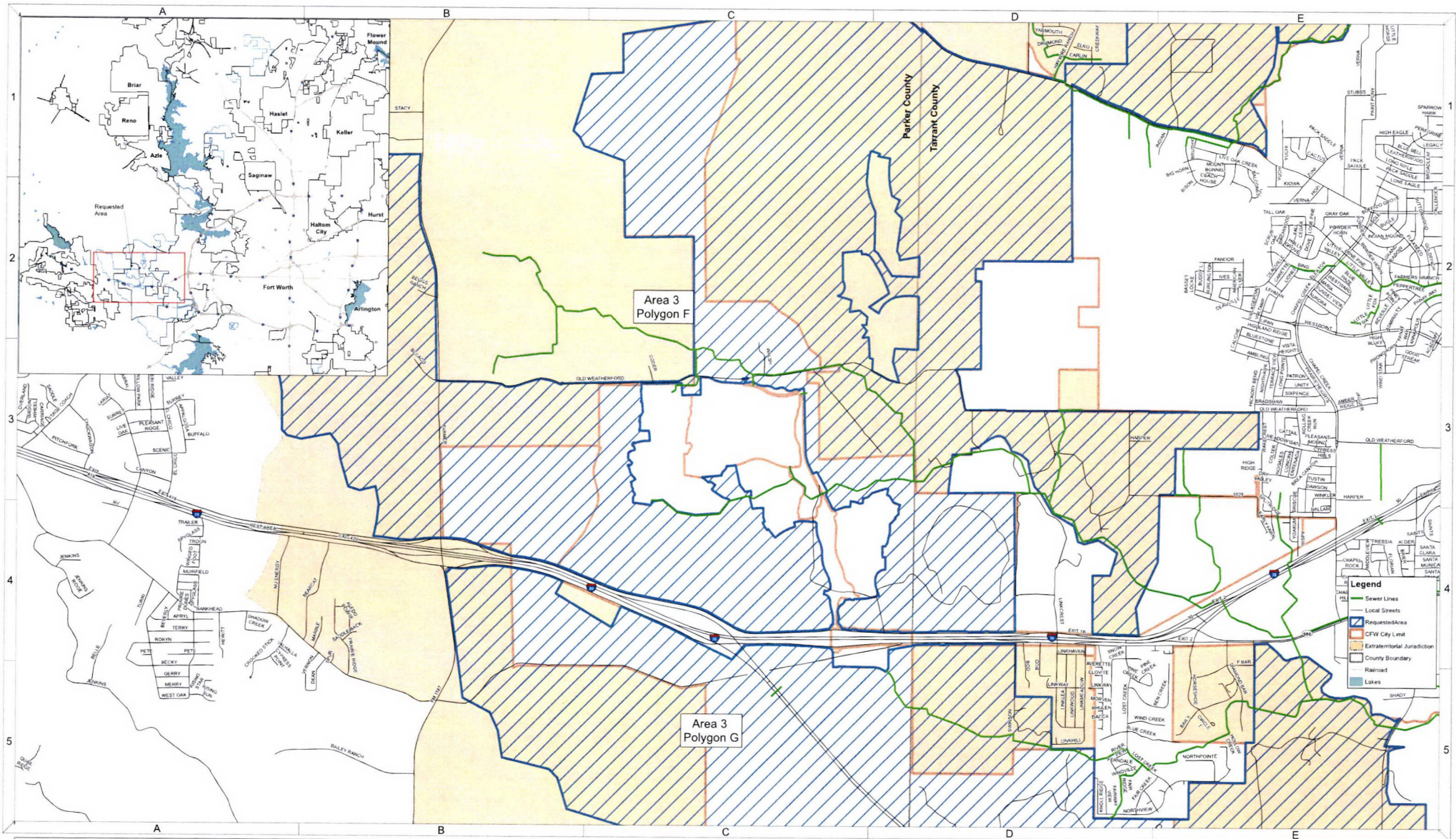
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Large Scale Map Fort Worth Water Proposed Amendment to CCN Area 3

FORT WORTH
WATER

0 1,300 2,600 5,200
Feet

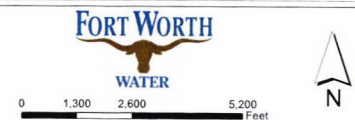
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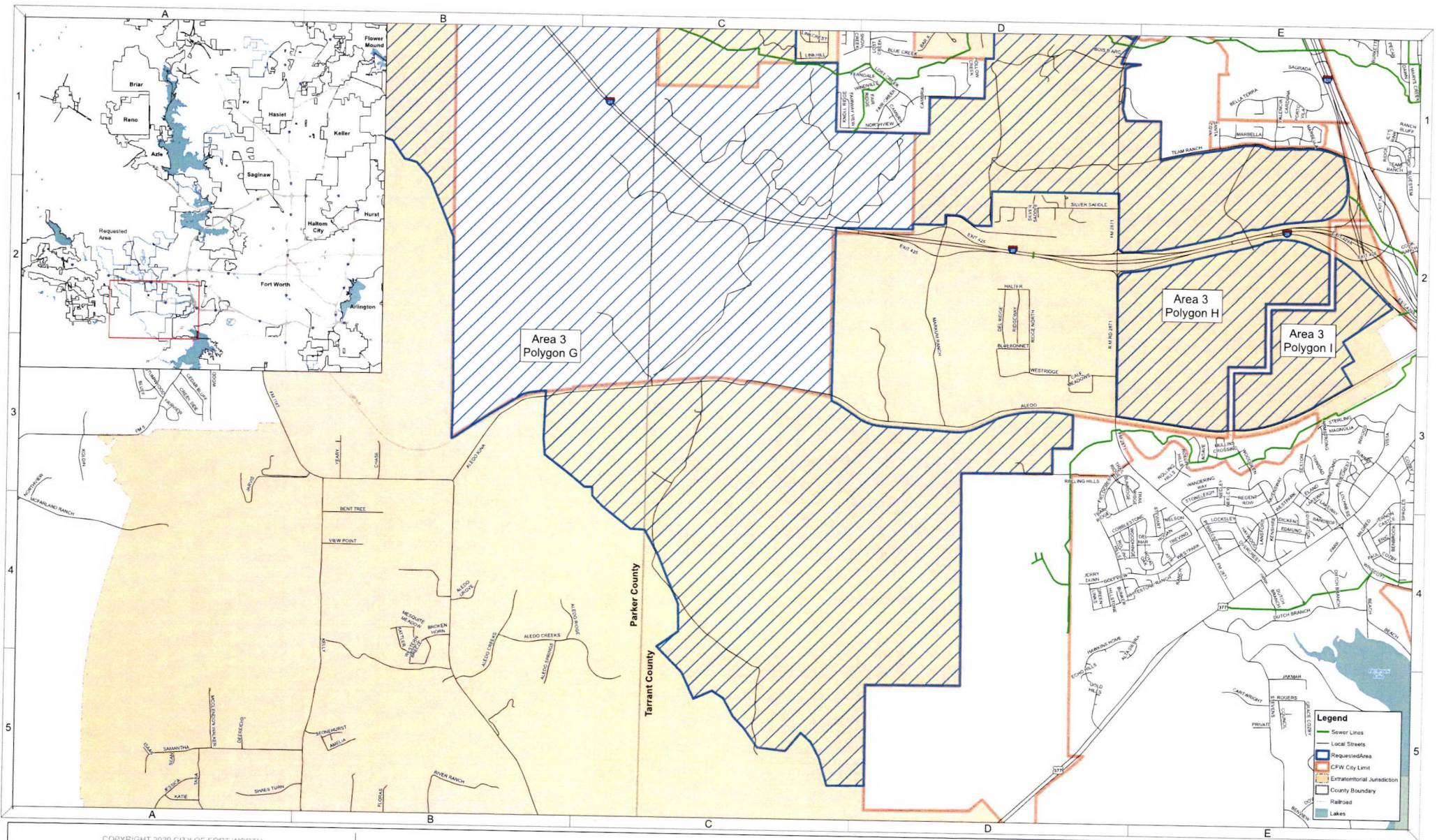


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Large Scale Map Fort Worth Water Proposed Amendment to CCN Area 3B





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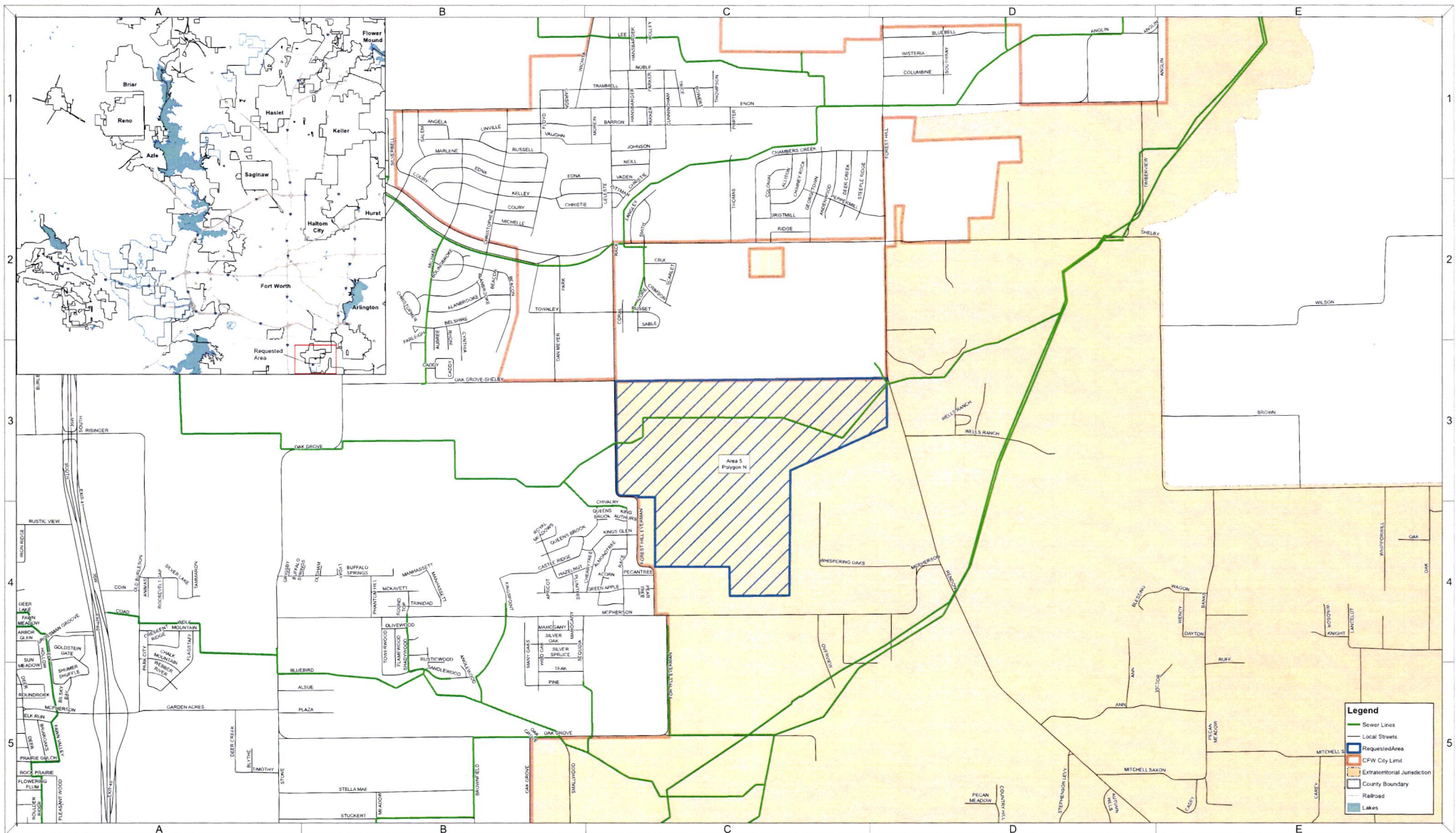
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Large Scale Map Fort Worth Water Proposed Amendment to CCN Area 3C



0 1,300 2,600 5,200 Feet





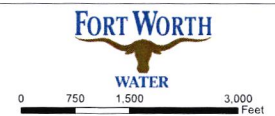
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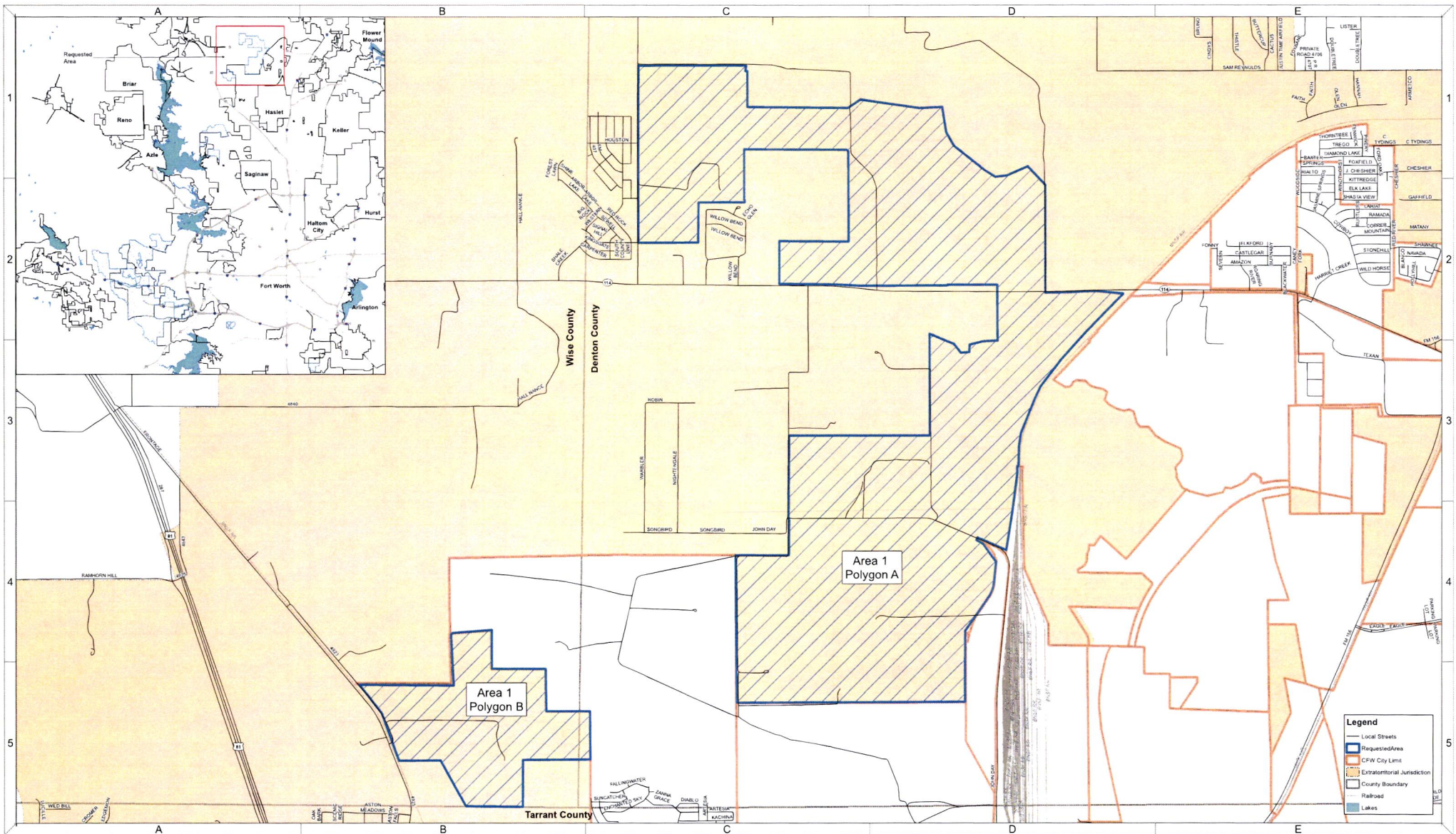
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Large Scale Map Fort Worth Water Proposed Amendment to CCN Area 5



Attachment C

Maps in Response to Staff's RFI No. 1-7



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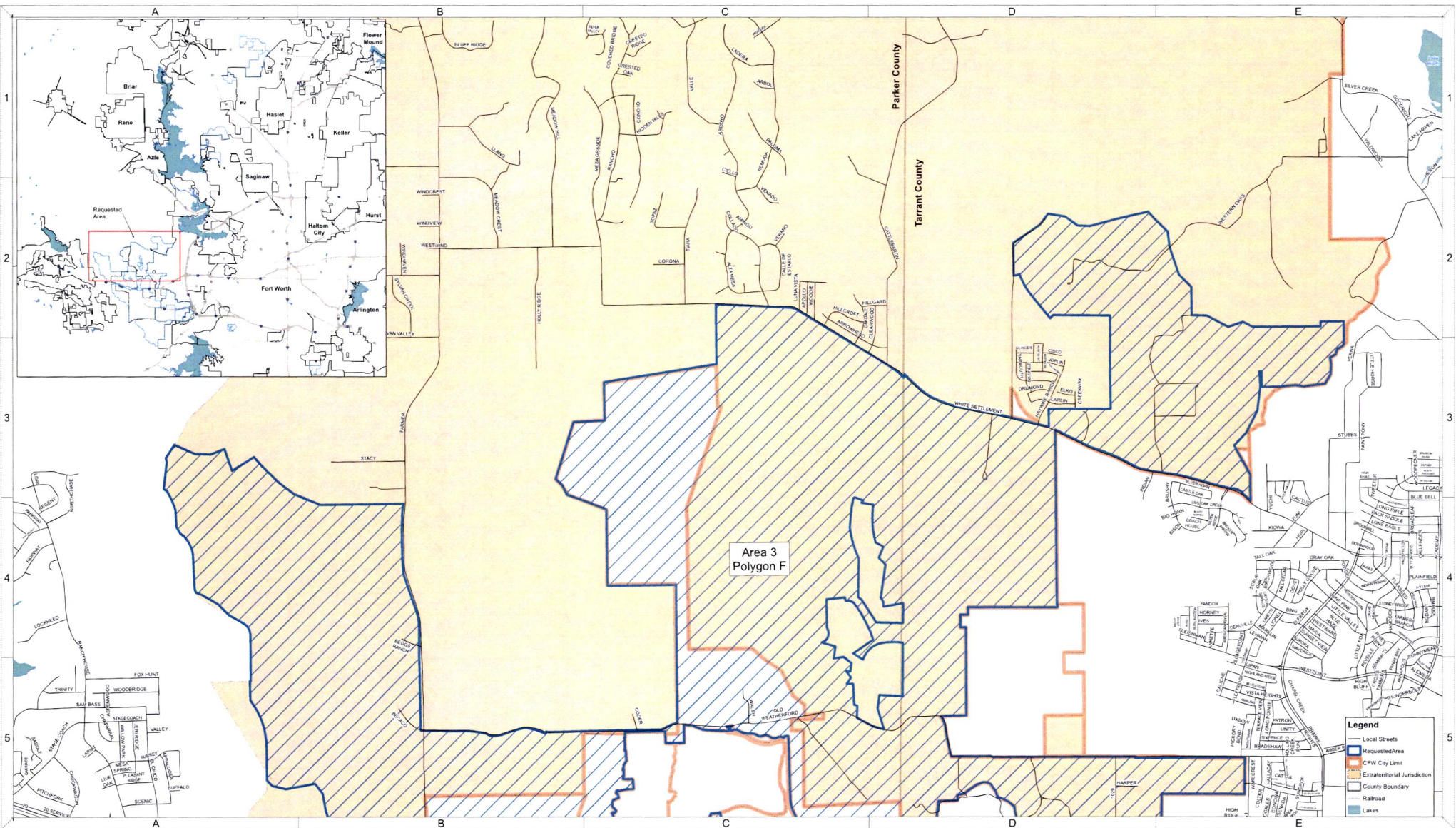
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Large Scale Map Fort Worth Water Proposed Amendment to CCN Area 1

FORT WORTH
WATER

0 1,250 2,500 5,000
Feet





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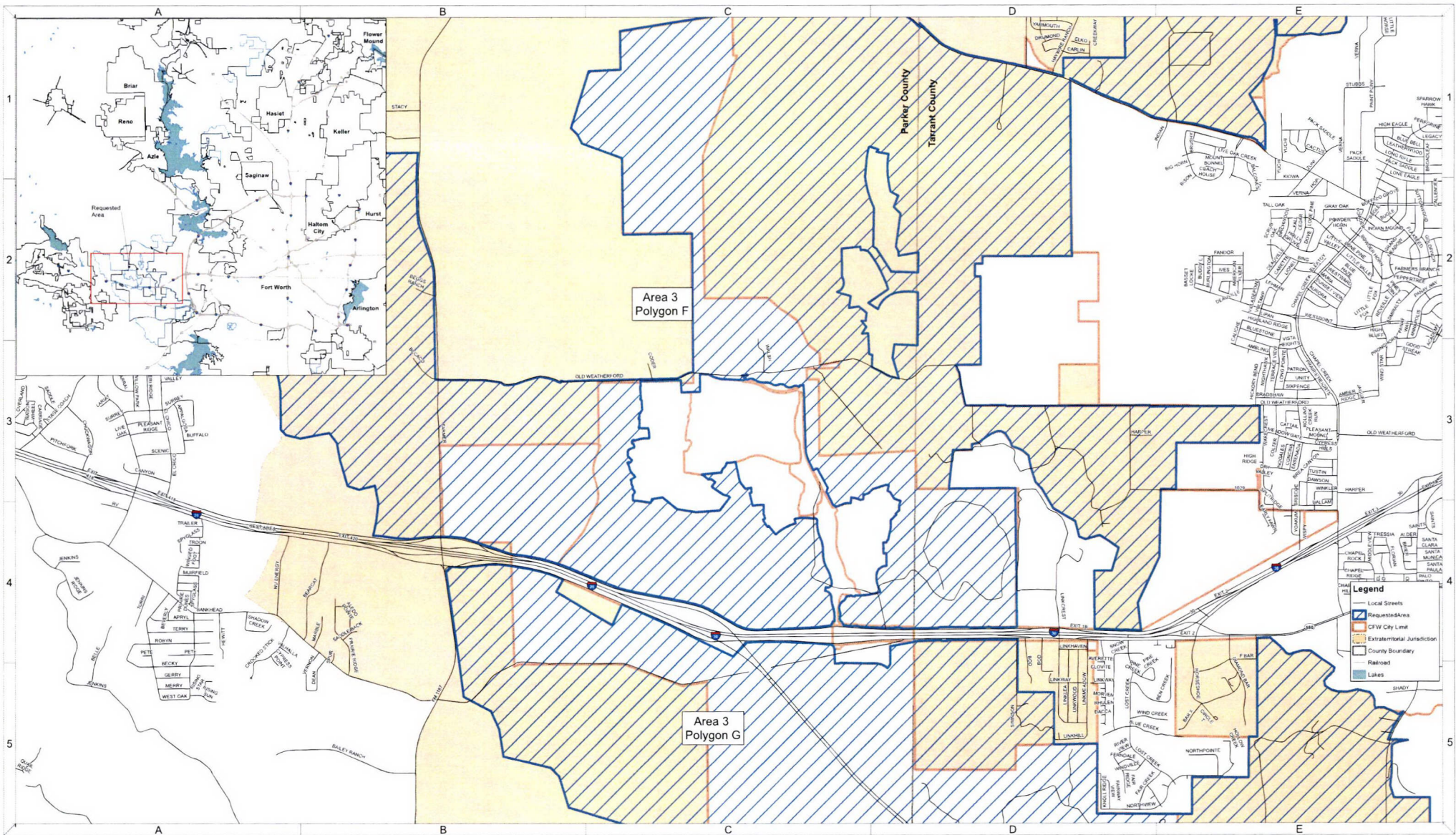
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Large Scale Map Fort Worth Water Proposed Amendment to CCN Area 3



0 1,300 2,600 5,200
Feet





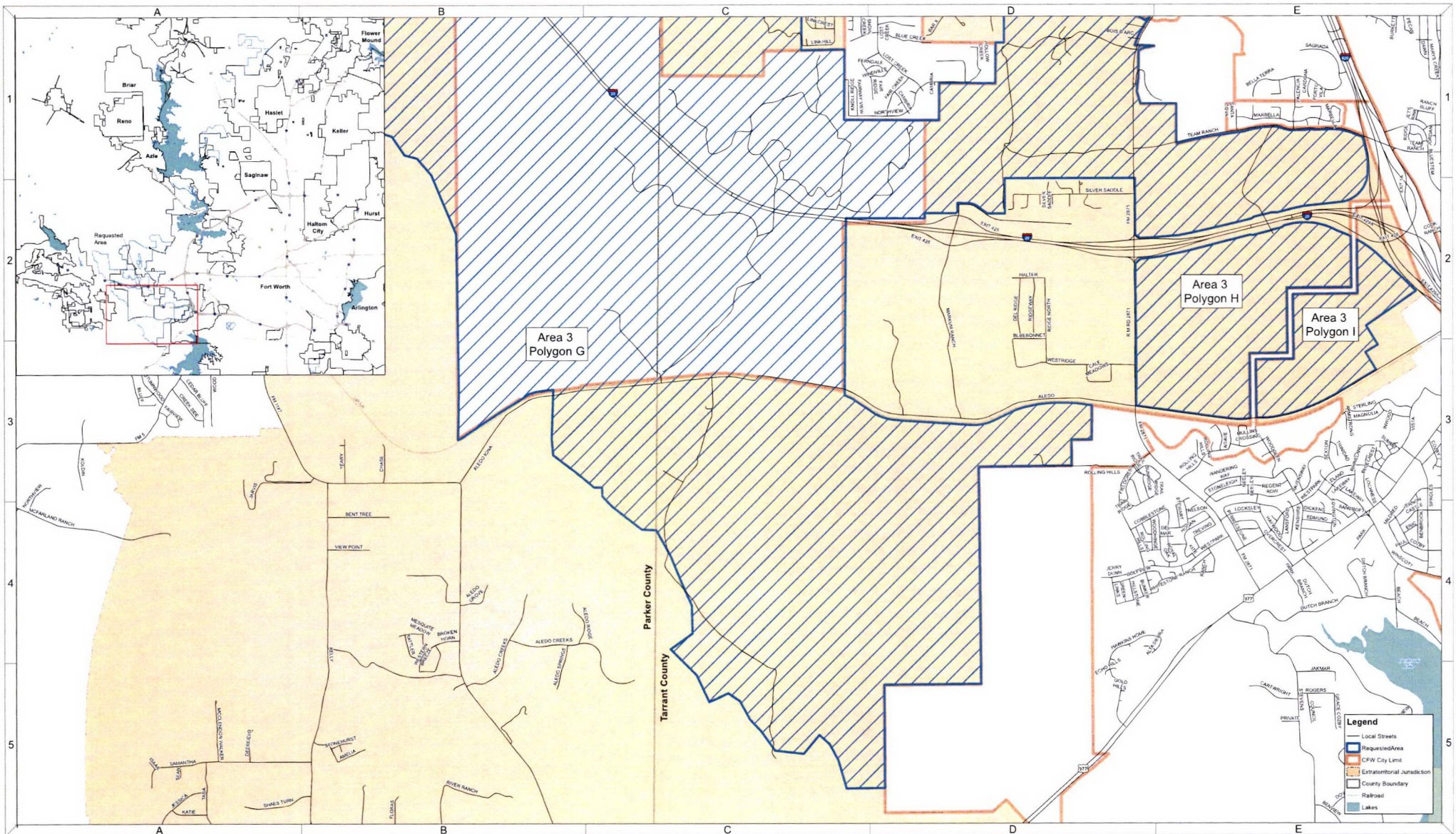
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Large Scale Map Fort Worth Water Proposed Amendment to CCN Area 3B



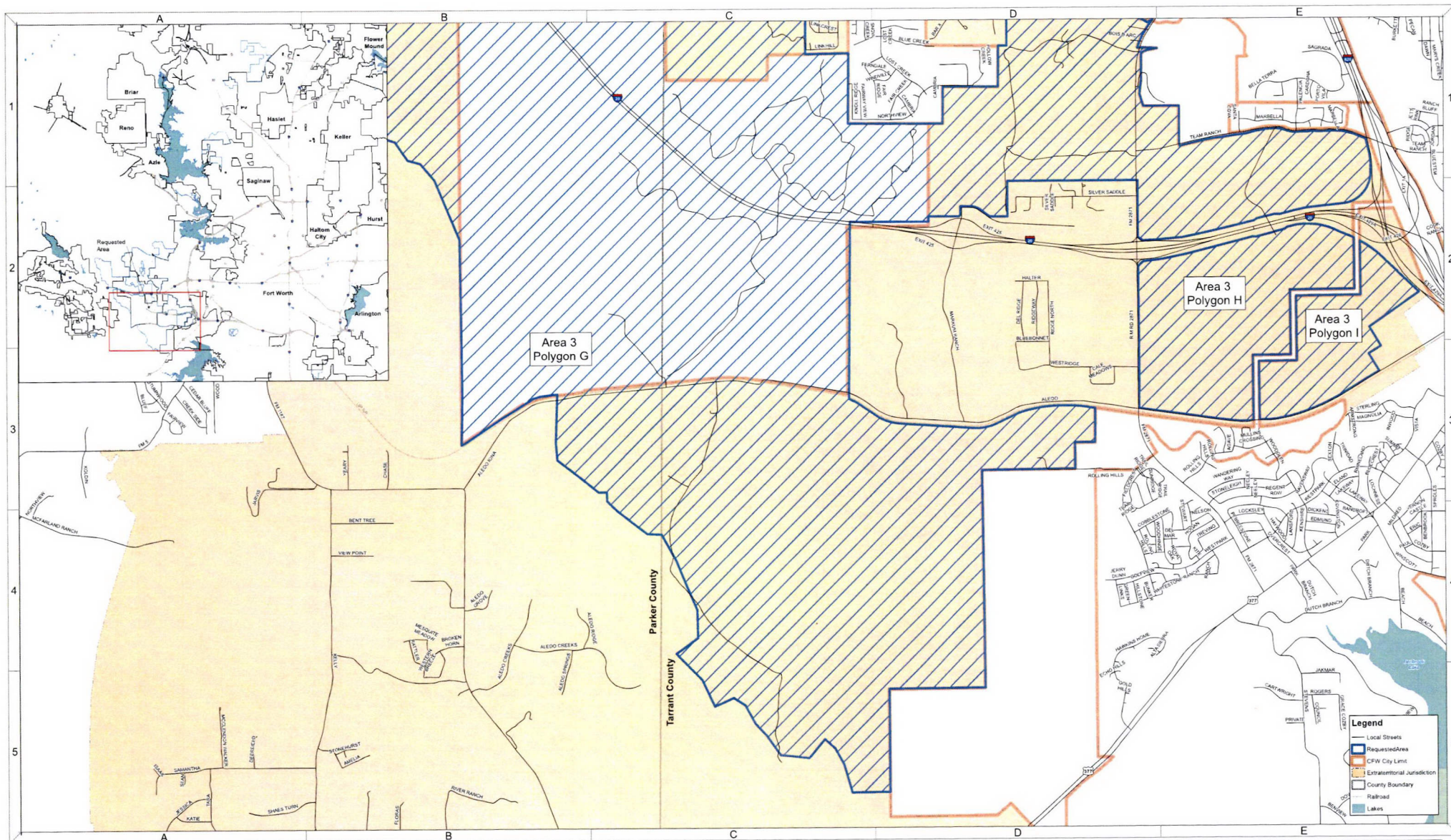


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Large Scale Map Fort Worth Water Proposed Amendment to CCN Area 3C

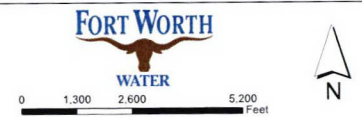




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Large Scale Map Fort Worth Water Proposed Amendment to CCN Area 3C





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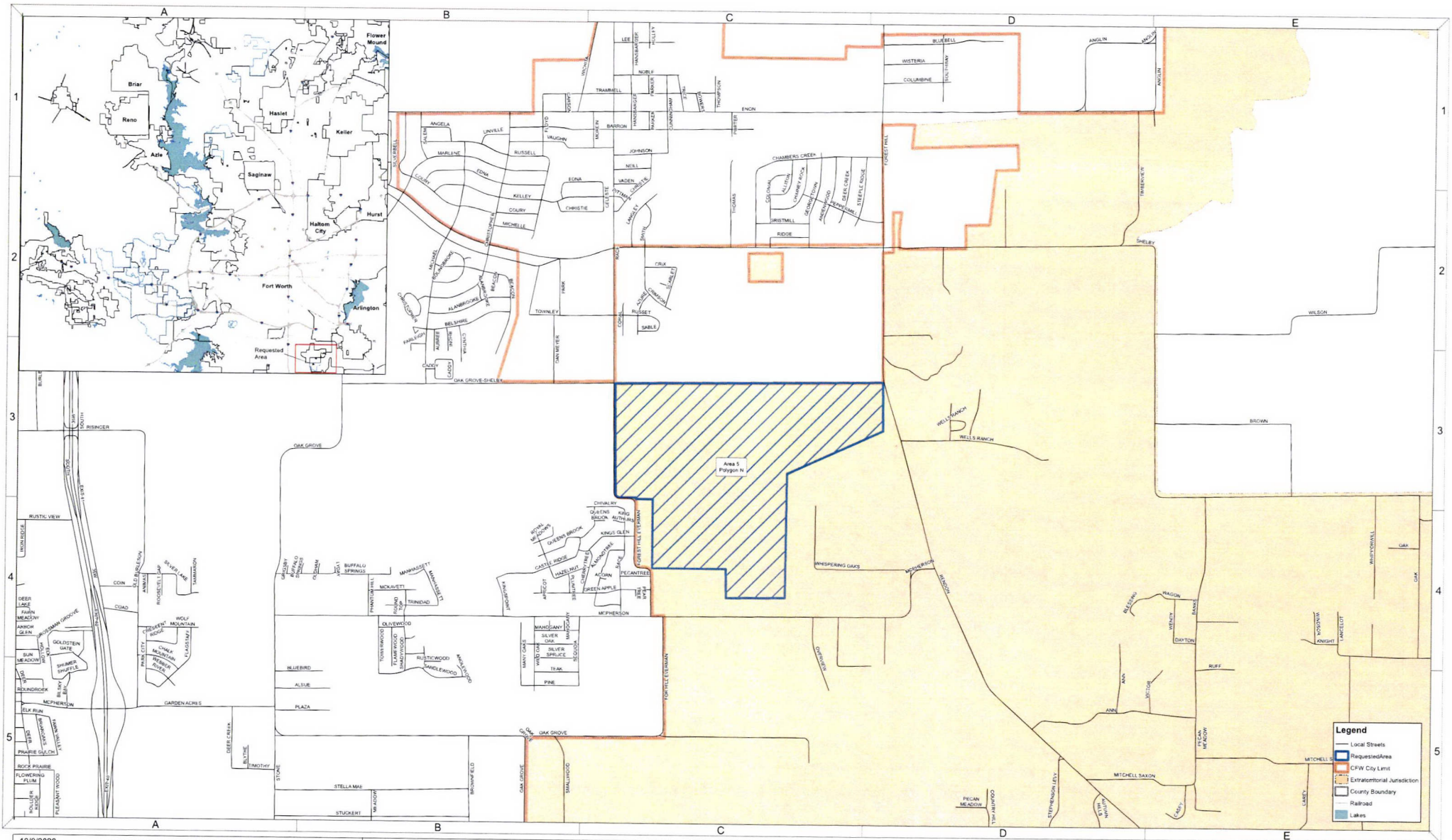
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Large Scale Map Fort Worth Water Proposed Amendment to CCN Area 4



0 395 790 1,580 Feet





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Large Scale Map Fort Worth Water Proposed Amendment to CCN Area 5

FORT WORTH
WATER

0 750 1,500 3,000
Feet



CD ATTACHED

TO VIEW PLEASE CONTACT
CENTRAL RECORDS
512-936-7180