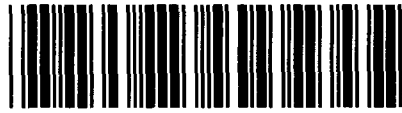




Control Number: 49366



Item Number: 11

Addendum StartPage: 0

DOCKET NO. 49366

RECEIVED

PETITION OF FROST BANK §
NATIONAL BANK, AS TRUSTEE §
OF THE FREEMAN EDUCATIONAL §
FOUNDATION TO AMEND THE §
CITY OF SAN MARCOS' WATER §
CERTIFICATE OF CONVENIENCE §
AND NECESSITY IN HAYS COUNTY §
BY EXPEDITED RELEASE §

PUBLIC UTILITY COMMISSION § 18

PUBLIC UTILITY COMMISSION
OF TEXAS
FILING CLERK

**COMMISSION STAFF'S FIRST REQUEST FOR INFORMATION
TO THE CITY OF SAN MARCOS
QUESTION NOS. STAFF 1-1 THROUGH STAFF 1-4**

Pursuant to 16 Texas Administrative Code Ann. (TAC) § 22.144, the Staff of the Public Utility Commission of Texas (Staff) requests that the City of San Marcos by and through their 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 10 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: May 1, 2019

Respectfully submitted,

**PUBLIC UTILITY COMMISSION OF TEXAS
LEGAL DIVISION**

Margaret Uhlig Pemberton
Division Director

Karen S. Hubbard
Managing Attorney

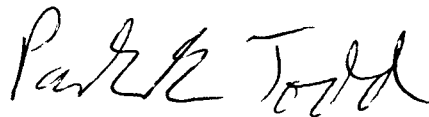


Patrick D. Todd
State Bar No. 24106513
1701 N. Congress Avenue
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Austin, Texas 78711-3326
(512) 936-7290
(512) 936-7268 (facsimile)
Patrick.Todd@puc.texas.gov

DOCKET NO. 49366

CERTIFICATE OF SERVICE

I certify that a copy of this document will be served on all parties of record on May 1, 2019 in accordance with 16 TAC § 22.74.



Patrick D. Todd

DOCKET NO. 49366

**COMMISSION STAFF'S FIRST REQUEST FOR INFORMATION
TO THE CITY OF SAN MARCOS
QUESTION NOS. STAFF 1-1 THROUGH STAFF 1-4**

DEFINITIONS

- A. "San Marcos," "you," or "the City" refers to the City of San Marcos and any person acting or purporting to act on their 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 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.
- C. "Frost Bank property" refers to the subject property described in the exhibits to the Petition of Frost Bank National Bank.

DOCKET NO. 49366

**COMMISSION STAFF'S FIRST REQUEST FOR INFORMATION
TO THE CITY OF SAN MARCOS
QUESTION NOS. STAFF 1-1 THROUGH STAFF 1-4**

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 THE CITY OF SAN MARCOS
QUESTION NOS. STAFF 1-1 THROUGH STAFF 1-4**

- Staff 1-1** Please provide any contracts for water or sewer service to the Frost Bank property.
- Staff 1-2** Please provide any bills for water or sewer service to the Frost Bank property.
- Staff 1-3** Please provide any other documents that shows evidence of water or sewer service from the City of San Marcos to the Frost Bank property.
- Staff 1-4** Identify the time period(s) during which the Frost Bank property received water or sewer service.