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DOCKET NO. 49558

APPLICATION OF THE CITY OF LAGO §
VISTA FOR WATER AND SEWER §
CERTIFICATES OF CONVENIENCE §
AND NECESSITY AND TO CANCEL §
LOHMAN'S FORD WATER §
COMPANY'S CERTIFICATE OF §
CONVENIENCE AND NECESSITY IN §
TRAVIS COUNTY §

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PUBLIC UTILITY COMMISSION
OF TEXAS
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**COMMISSION STAFF'S THIRD REQUEST FOR INFORMATION
TO THE CITY OF LAGO VISTA
QUESTION NOS. STAFF 3-1 THROUGH 3-5**

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 the City of Lago Vista by and through its 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 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.

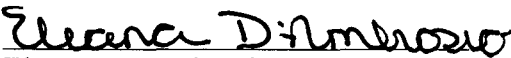
Dated: February 20, 2020

Respectfully submitted,

**PUBLIC UTILITY COMMISSION OF TEXAS
LEGAL DIVISION**


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**DOCKET NO. 49558
CERTIFICATE OF SERVICE**

I certify that a copy of this document will be served on all parties of record on February 20, 2020 in accordance with 16 TAC § 22.74.


Eleanor D'Ambrosio

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**COMMISSION STAFF'S THIRD REQUEST FOR INFORMATION
TO THE CITY OF LAGO VISTA
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DEFINITIONS

- 1) "City," "Company" or "you" refers to the City of Lago Vista 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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QUESTION NOS. STAFF 3-1 THROUGH 3-5**

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 THIRD REQUEST FOR INFORMATION
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QUESTION NOS. STAFF 3-1 THROUGH 3-5**

- Staff 3-1** Reference the response to Staff 2-1, which indicates that the City is currently in Interim I Phase for effluent disposal. Please explain when City will enter:
 (a) Interim Phase II; and
 (b) the Final Phase
- Staff 3-2** Reference the application showing 3,337 existing sewer connections; the response to Staff 2-1, which indicates that the City is currently in Interim I Phase for effluent disposal (allowing for authorized effluent treatment in an amount not to exceed 0.60 MGD); and the Texas Commission on Environmental Quality's (TCEQ's) standard for effluent treatment of 300 gallons per day per connection. Please admit or deny that Interim I Phase provides treatment capacity for a maximum of 2,000 connections.
- Staff 3-3** Reference the application showing 3,337 existing sewer connections; the response to Staff 2-1, which indicates that the City's Final Phase for effluent disposal (allowing for authorized effluent treatment in an amount not to exceed 1.0 MGD); and the TCEQ's standard for effluent treatment of 300 gallons per day per connection. Please admit or deny that even in the Final Phase, the permit capacity cannot handle 3,337 connections.
- Staff 3-3** If the answer to Staff 3-2 is admit, please explain how the City plans to address this capacity shortfall.
- Staff 3-4** If the answer to Staff 3-2 is deny, please explain how the Final Phase for effluent disposal (allowing for authorized effluent treatment in an amount not to exceed 1.0 MGD) provides treatment capacity sufficient to serve 3,337 connections.
- Staff 3-5** Reference the application, which states that the City does not need to purchase water from another source to serve the requested area, and the response to Staff 1-2, which indicates that the City has filed the TCEQ construction approval letter of Draper Estates Water System for interconnection with the City of Lago Vista Water System. Please explain the reason for the interconnection, including whether Lago Vista will need to purchase water from Draper Estates to serve the requested area.