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PUBLIC UTILITY COMMISSION
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FILING CLERK
OF TEXAS

APPLICATION OF NI AMERICA §
TEXAS, LLC AND MONARCH §
UTILITIES I L.P. FOR SALE, §
TRANSFER, OR MERGER OF §
FACILITIES AND CERTIFICATE §
RIGHTS IN TRAVIS COUNTY §

**COMMISSION STAFF'S REQUEST FOR INFORMATION
QUESTION NOS 1-1 THROUGH 1-2**

The Commission Staff of the Public Utility Commission of Texas (Staff) requests that NI America Texas, LLC and Monarch Utilities I L.P. (Applicants) 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, Applicants must 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 that 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: December 10, 2019

Respectfully submitted,

**PUBLIC UTILITY COMMISSION OF TEXAS
LEGAL DIVISION**

Thomas S. Hunter
Division Director

Rachelle Nicolette Robles
Managing Attorney

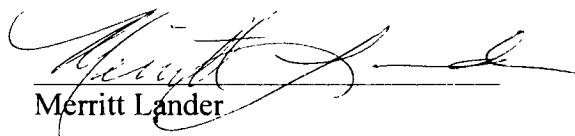


Merritt Lander
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(512) 936-7290
(512) 936-7268 (facsimile)
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CERTIFICATE OF SERVICE

I certify that a copy of this document will be served on all parties of record
December 10, 2019 in accordance with 16 TAC § 22.74.



Merritt Lander

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**COMMISSION STAFF'S FIRST REQUEST FOR INFORMATION
TO MONARCH AND NI AMERICA
QUESTION NOS. STAFF 1-1 THROUGH STAFF 1-2**

DEFINITIONS

- 1) "You" refers to NI America Texas, LLC, Monarch Utilities I L.P., and any person acting or purporting to act on their behalf, including, without limitation, attorneys, agents, advisors, investigators, representatives, employees or other persons.

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**COMMISSION STAFF'S FIRST REQUEST FOR INFORMATION
TO MONARCH AND NI AMERICA
QUESTION NOS. STAFF 1-1 THROUGH STAFF 1-2**

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 MONARCH AND NI AMERICA
QUESTION NOS. STAFF 1-1 THROUGH STAFF 1-2**

Staff 1-1 Please provide documentation showing that the violations for the systems listed below, as shown in the Texas Commission on Environmental Quality's databases, are now compliant or provide proof that the utility is working towards being compliant:

- a) PWS ID: 2490053 – Coyote Ridge Addition
- b) PWS ID: 2490046 – Hills of Oliver Creek
- c) PWS ID: 2490061 – Sky View Ranch Estates
- d) PWS ID: 2490050 – Windmill Trail
- e) PWS ID: 1070159 - Dal High Water System
- f) PWS ID: 1870055 -- Oak Terrace Estates Water System
- g) PWS ID: 1870130 -- Pinwah Pines Estates
- h) PWS ID: 1870160 -- Garden Acres Water System
- i) PWS ID: 2120064 – Lakeway Harbor Subdivision
- j) PWS ID: 1110004 - Oak Trail Shores Pws
- k) PWS ID: 2490051 -- Aurora Vista
- l) PWS ID: 1070106 -- Carolynn Estates
- m) PWS ID: 2040045 - Cedar Valley Subdivision
- n) PWS ID: 2040008 - Governors Point
- o) PWS ID: 1070039 Lollipop Water Works
- p) PWS ID: 1110044 – Montego Bay Estates
- q) PWS ID: 0910052 Tanglewood On Texoma
- r) PWS ID: 1840014 Western Lake Estates

Staff 1-2 Please confirm that notice have been provided to landowners within the area named Las Brisas.