



Control Number: 49792



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SOAH DOCKET NO. 473-20-1124.WS  
DOCKET NO. 49792

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JIMMY GIBSON'S APPEAL OF THE COST §  
OF OBTAINING SERVICE FROM DESERT §  
WATER SUPPLY CORPORATION IN §  
COLLIN COUNTY §  
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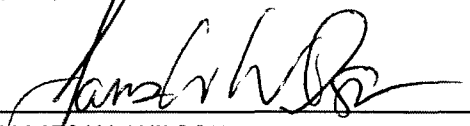
BEFORE THE STATE OFFICE  
OF  
ADMINISTRATIVE HEARINGS

**DESERT WATER SUPPLY CORPORATION'S RESPONSE TO  
COMMISSION STAFF'S FIRST REQUEST FOR INFORMATION  
QUESTION NOS. STAFF 1-1 THROUGH STAFF 1-8**

Desert Water Supply Corporation ("Desert") files this Response to Commission Staff's First Request for Information, which Desert received on January 17, 2020. Pursuant to SOAH Order No. 2 issued on December 10, 2019, the Parties have 10 calendar days from receipt to serve responses to discovery requests "unless otherwise agreed to by the Parties." On January 27, 2020, Desert filed notice that Commission Staff extended the deadline for Desert to respond Question Nos. Staff 1-1 Through Staff 1-8 until January 30, 2020, so Desert's responses are timely filed.

Respectfully submitted,

JAMES W. WILSON & ASSOCIATES, PLLC  
103 W. Main Street  
Allen, Texas 75013  
(972) 727-9904  
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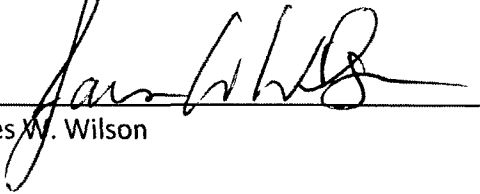
MARIA HUYNH  
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24

ATTORNEYS FOR RESPONDENT,  
DESERT WATER SUPPLY CORPORATION

**CERTIFICATE OF SERVICE**

I certify that I have served or will serve a copy of this document on all parties of record on  
January 29, 2020, in accordance with 16 Tex. Admin. Code § 22.74.

  
James W. Wilson

**SERVICE LIST  
PUC DOCKET NO. 49792**

Taylor P. Denison Legal Division Public Utility Commission 1701 N Congress Ave Ste 8-110 Austin, TX 78711 (512) 936-7260 (512) 936-7268 Fax Taylor.Denison@puc.texas.gov	Jimmy Gibson P.O. Box 459 Blue Ridge, TX 75424 (214) 794-2094 NO FAX gibson32ford@aol.com
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**DESERT WSC'S RESPONSE TO COMMISSION STAFF'S  
FIRST REQUEST FOR INFORMATION**

**STAFF 1-1** Please provide a copy of Desert WSC's most recently approved tariff.

**RESPONSE:** Desert WSC is producing a copy of its most recently approved tariff.

Prepared by: Terri Rountree, Office Manager

Sponsored by: TBD

**STAFF 1-2** Please provide a copy of Desert WSC's bylaws.

**RESPONSE:** Desert WSC is producing a copy of its bylaws.

Prepared by: Terri Rountree, Office Manager

Sponsored by: TBD

- STAFF 1-3** In reference to the itemized list provided to the Appellant, please provide all internal documentation used to create the itemized list, including the following:
- a. All drafts of spreadsheets created by Desert WSC related to the calculating/comparing the costs for Mr. Gibson to obtain water service;
  - b. All notes from internal Desert WSC discussions and meetings related to the cost for Mr. Gibson to obtain water service; and
  - c. Any other documents created by Desert WSC related to the cost for Mr. Gibson to obtain water service.

**RESPONSE:** Desert WSC is producing board minutes, a service investigation request, and development requirements letter.

Prepared by: Eddy Daniel, P.E.

Sponsored by: Eddy Daniel, P.E.

**STAFF 1-4** Will any other customers, present or future, potentially be able to receive service from the line extension proposed to serve Mr. Gibson? If "yes," please answer the following:

- a. Will Desert WSC reimburse Mr. Gibson for a present or future customer's share of the extension cost?
- b. In reference to Staff 1 -4(a), if "yes," please explain, and demonstrate mathematically, how Desert WSC will determine the amount to reimburse Mr. Gibson.

**RESPONSE:** Yes, present or future customers will potentially receive service from the line extension proposed to serve Mr. Gibson.

The on-site improvements are within Mr. Gibson's development and on his property only. The off-site improvements required of Mr. Gibson is the minimum waterline extension size per the requirements of Desert WSC, which is a 6-inch diameter pipe. Desert WSC intends to upsize the waterline to an 8-inch pipe and will pay the cost difference to provide additional capacity to serve future customers. Accordingly, there will not be any reimbursement to Mr. Gibson.

Prepared by: Eddy Daniel, P.E.

Sponsored by: Eddy Daniel, P.E.

**STAFF 1-5** In a response to appeal, Desert WSC mentioned that Desert's Engineer performed a hydraulic analysis on the water system that indicates an existing 4-inch waterline along SH 160 creates a serious bottleneck to preventing adequate water flows to the southern portions of Desert's water system. Please provide all the documentation related to this analysis.

**RESPONSE:** Desert WSC is producing a system improvements map and estimated costs/budget from latest hydraulic analysis. Desert WSC is also producing a drawing of the bottle neck location.

Prepared by: Eddy Daniel, P.E.

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**STAFF 1-6** Regarding the amount of water Mr. Gibson intends to use, please answer the following:

- a. Did Mr. Gibson convey how much water he intends to use on a monthly basis? If "yes," how much water did Mr. Gibson state that he intends to use?
- b. If Mr. Gibson did not convey how much water he intends to use, what amount of water did Desert WSC project he would use on a monthly basis in calculating the cost of obtaining service?
- c. If Desert WSC projected the amount of water that Mr. Gibson would use on a monthly basis, please explain how it identified the projected amount of usage.

**RESPONSE:** Mr. Gibson indicated that each service connection will use 9 GPM.

Desert WSC did not project monthly water usage to calculate the cost of obtaining service. Desert WSC used the hydraulic model and 1.5 GPM per connection for running the hydraulic model.

Prepared by: Eddy Daniel, P.E.

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**STAFF 1-7** Regarding the purpose for which Mr. Gibson requested water service, please answer the following:

- a. Did Mr. Gibson convey the purpose for which he was requesting water service, i.e. residential use, commercial use, other use?
- b. If Mr. Gibson did not convey the purpose for which he was requesting water service, did Desert WSC make a determination regarding Mr. Gibson's anticipated purpose for obtaining water service?
- c. If Desert WSC made a determination as to the purpose for which Mr. Gibson was requesting water service, please explain how it identified such purpose.

**RESPONSE:** Mr. Gibson informed Desert WSC's engineer and general manager that he required water service for a residential development.

Prepared by: Eddy Daniel, P.E.

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**STAFF 1-8** Please provide documentation demonstrating the cost of obtaining service for other similarly situated Desert WSC customers over the past years, if any. For purposes of this question, "similarly situated," refers to customers requesting water service for the same purpose (i.e. residential use, commercial use, other use) and condition (upgrade/improvement on existing pipe network).

**RESPONSE:** Desert WSC has no similarly situated customers. The majority of Desert WSC's service area is in a very rural part of northeast Collin County. The rapid growth experienced by much of Collin County during the past two decades is just now reaching Desert WSC's service area. However, the cost of obtaining service that will require system improvements is determined by preparing plans and specifications, and then obtaining bids for the project. That process is consistently used for all service requests that require system improvements.

Desert WSC is producing the plans and specifications and bid tabulation for the Gibson waterline improvement project.

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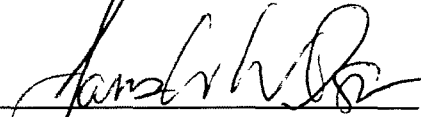
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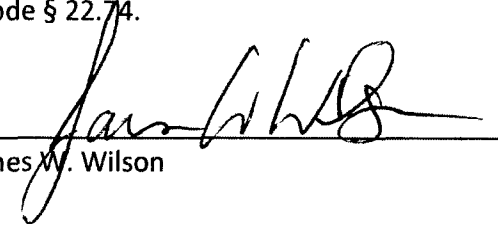
  
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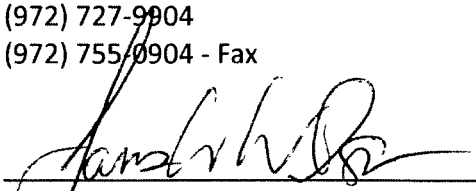
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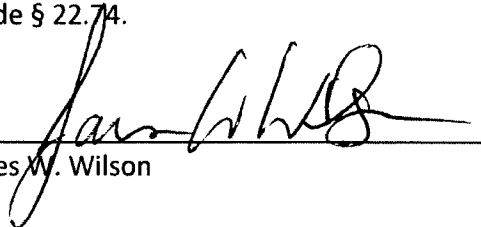
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