

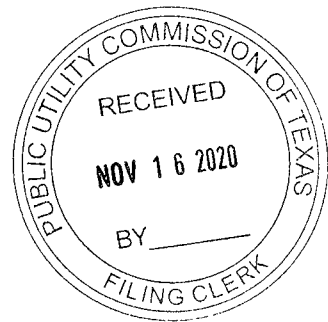


Control Number: 49845



Item Number: 38

Addendum StartPage: 0



DOCKET NO. 49845

**APPLICATION OF RIVER ACRES
WATER SUPPLY CORPORATION TO
AMEND ITS WATER CERTIFICATE
OF CONVENIENCE AND NECESSITY
IN NUECES COUNTY**

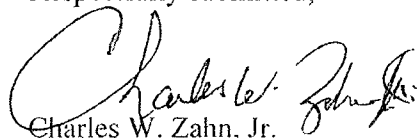
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**PUBLIC UTILITY COMMISSION
OF TEXAS**

**RIVER ACRES WATER SUPPLY CORPORATION'S RESPONSE TO COMMISSION
STAFF'S SECOND REQUEST FOR INFORMATION TO RIVER ACRES WATER
SUPPLY CORPORATION QUESTION NOS. STAFF 2-1 THROUGH STAFF 2-2**

COMES NOW River Acres Water Supply Corporation and files this its Response to Commission Staff's Request for Information to River Acres Water Supply Corporation Question Nos. Staff 2-1 through Staff's 2-2 and for such responses would show as per the attached.

Respectfully submitted,



Charles W. Zahn, Jr.

Attorney at Law

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Attorney for Applicant

AFFIDAVIT OF FACT

THE STATE OF TEXAS §
COUNTY OF NUECES §

KNOW ALL MEN BY THESE PRESENTS:

BEFORE ME, the undersigned Notary Public in and for the State of Texas, personally appeared Paul Pilarczyk known by me and after being sworn stated upon his oath that:

My name is Paul M. Pilarczyk and I am a Licensed Professional Engineer in the State of Texas with Hanson Professional Services, Inc. I am the engineer for River Acres Water Supply Corporation, the Applicant in the Application of River Acres Water Supply Corporation to Amend its Certificate of Convenience and Necessity in Nueces County now pending before the Public Utility Commission of Texas (the "Commission"). On or about October 15, 2020 staff for the Commission filed Staff's First Request for Information to River Acres Water Supply Corporation Question Nos. Staff 2-1 and Staff 2-2. I am familiar with River Acres Water Supply Corporation ("RAWS") and the Application to extend RAWS Certificate of Convenience and Necessity ("CCN"). I am also familiar with the two areas that RAWS seeks to include in its CCN upon a favorable consideration by the Commission of its Application. After a reasonable inquiry to management of RAWS I am also aware of individuals and/or businesses that have made requests for service within the two areas that RAWS seeks to include in its CCN. I am also aware of the water transmission and distribution system serving the two areas that RAWS seeks to extend its Certificate of Convenience and Necessity. Accordingly, I would state the following in response to Staff's questions:

Staff 2-1 The total requested area in Area 1 is approximately 483 acres. River Acres WSC has received only one request for service with respect to Area 1: a request to serve an area of approximately 117 acres from Mr. James Dean. Please provide all documentation supporting the need for service for the rest of the requested area.

Attached hereto as Exhibit "A" is a map depicting Area 1 showing the location of a 12" distribution main that is in place with the capacity to provide potable water to the area designated as Area 1 by early 2021. The 12" distribution main extends from approximately East Riverview, along FM 624 to the corner of County Road 75 at FM 624. Exhibit A also shows the location of a 6" distribution main that ties into the 12" distribution main, and extends the entire length of County Road 75 from FM 624 until almost the north end of the road near the Ballard Road Pit. These two distribution lines provides RAWs with the ability and the capacity to provide a potable water supply to all of Area 1, including the approximately 117 acres of Mr. James Dean. The area described in Area 1 is in the growth pattern of Nueces County, Texas and does not have a source of water distribution other than the distribution lines described herein. RAWs through the installation of the distribution and water lines in this area and the amendment of its Certificate of Convenience and Necessity is its way of being ready to serve this area when the expansion actually occurs. The City of Corpus Christi is the regional supplier of water but does not include the area in Area 1 in its Certificate of Convenience and Necessity. The City of Corpus Christi does not

have any distribution lines in this area and does not intend to provide service in this area at this time (See previous communication from the City of Corpus Christi filed in this matter).

Staff 2-2 The total requested area in Area 2 is approximately 333 acres. River Acres WSC has received two requests for service with respect to Area 2: a request to serve an area of approximately 40 acres from Mr. Dan Murphy and his company Puerto Los Caballeros, and a request to serve approximately 5 acres from Dollar General. Please provide all documentation supporting the need for service for the rest of the requested area.

Attached hereto as Exhibit "A" is a map depicting Area 2 showing the location of a 12" distribution main that is in place with the capacity to provide potable water to the area designated as Area 2. The 12" distribution main is located on the north side of FM 624, extending from East Riverview @ FM 624 to County Road 75. Exhibit A also shows the location of a 6" water line on the south side of FM 624, extending from River Trail @ FM 624 to Carousal Lane @ FM 624. The distribution line and water line provides RAWS with the ability and the capacity to provide a potable water supply to all of Area 2, including the approximately 40 acres of Mr. Dan Murphy and the 5 acres of Dollar General. The area described in Area 2 is in the growth pattern of Nueces County, Texas and does not have a source of water distribution other than the distribution and water lines of RAWS described herein. RAWS through the installation of the distribution and water lines in this area and the amendment of its Certificate of Convenience and Necessity is its way of being ready to serve this area when the expansion actually occurs. The City of Corpus Christi is the regional supplier of water but does not include the area in Area 2 in its Certificate of Convenience and Necessity. The City of Corpus Christi does not have any distribution lines in this area and does not intend to provide service in this area at this time (See previous communication from the City of Corpus Christi filed in this matter).

Further Affiant sayeth not."

VERIFICATION

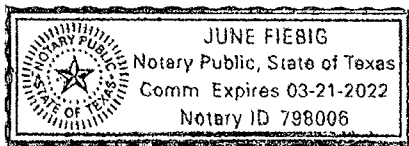
THE STATE OF TEXAS §
§
COUNTY OF NUECES §

BEFORE ME, the undersigned authority, personally appeared Paul M. Pilarczyk, who stated, upon oath, that the statements made in the foregoing instrument are within his personal knowledge and are true and correct.

Paul M. Pilarczyk

Paul M. Pilarczyk

SUBSCRIBED AND SWORN TO BEFORE ME on this the 28th day of October 2020 by Paul M. Pilarczyk.



June Fiebig

NOTARY PUBLIC - STATE OF TEXAS

CERTIFICATE OF SERVICE

I hereby 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 October ____, 2020, in accordance with the Order Suspending Rules, issued in Project No. 50664.

/s/Charles W. Zahn, Jr.

Charles W. Zahn, Jr.

Proposed CCN Expansion

River Acres Water Supply

AREA 1

6" Distribution Main






12" Distribution Main

**CURRENT RAWS WATER
LINE ON NORTH SIDE OF
FM 624- 12" Distribution Main**

AREA 2

**CURRENT RAWS WATER
LINE ON SOUTH SIDE OF
FM 624 - 6" Distribution Main**

Legend

-  Church
-  High Man Tower Airstrip
-  RAWS Distribution System
-  Tejas Veterinary Clinic: Perkins Robert W DVM
-  Wood River Elementary School

Google Earth

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4000 ft

