

Control Number: 50014



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DOCKET NO. 50014

**APPLICATION OF BIG WOOD
SPRINGS WATER SYSTEM FOR A
PRICE INDEX RATE ADJUSTMENT**

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PUBLIC UTILITY COMMISSION 2:00
OF TEXAS

**COMMISSION STAFF'S FIRST REQUEST FOR INFORMATION
TO BIG WOOD SPRINGS WATER SYSTEM
QUESTION NO. STAFF 1-1 THROUGH STAFF 1-7**

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 Big Wood Springs Water System 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 5 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.

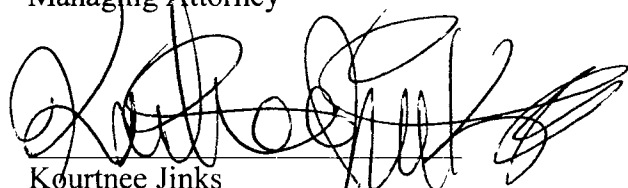
Dated: November 7, 2019

Respectfully submitted,

**PUBLIC UTILITY COMMISSION OF TEXAS
LEGAL DIVISION**

Margaret Uhlig Pemberton
Division Director

Karen S. Hubbard
Managing Attorney

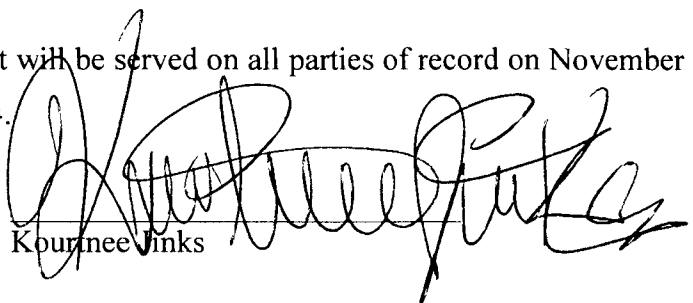


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CERTIFICATE OF SERVICE

I certify that a copy of this document will be served on all parties of record on November 7, 2019, in accordance with 16 TAC § 22.74.



Kourtnee Jinks

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**COMMISSION STAFF'S FIRST REQUEST FOR INFORMATION
TO BIG WOOD SPRINGS WATER SYSTEM
QUESTION NO. STAFF 1-1 THROUGH STAFF 1-7**

DEFINITIONS

- 1) "Applicant," "the Company" or "you" refers to Big Wood Springs Water System 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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**COMMISSION STAFF'S FIRST REQUEST FOR INFORMATION
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QUESTION NO. STAFF 1-1 THROUGH STAFF 1-7**

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 BIG WOOD SPRINGS WATER SYSTEM
QUESTION NO. STAFF 1-1 THROUGH STAFF 1-7**

- Staff 1-1 Please provide a probated will or other document confirming that David Petty is the executor of Paterteen Petty's estate.
- Staff 1-2 Please admit or deny that Paterteen Petty was operating Big Wood Springs Water system or Springs Water System or Big Wood Springs Water Company as a sole proprietorship before she was deceased. If admit, provide any document demonstrating this fact.
- Staff 1-3 If the answer to Staff 1-2 is deny, please provide any document, other than a tariff issued by the Texas Commission on Environmental Quality or Public Utility Commission, demonstrating the form of business under which Big Wood Springs Water System or Big Wood Springs Water Company is operating.
- Staff 1-4 Did Paterteen Petty have an assumed name certificate on file with Hopkins, Wood, or any other county in Texas in which Big Wood Springs Water Company or Big Wood Springs Water System operates? If the answer is yes, please provide a copy of the assumed name certificate.
- Staff 1-5 Please provide a full copy of the most recently approved tariff for water Certificate of Convenience and Necessity No. 12367 that is in your possession.
- Staff 1-6 Reference Water Tariff Page No. 2 filed on September 17, 2019, as part of the original application. Please admit or deny that Pat McCoy is the same person as Paterteen Petty. If deny, please explain who Pat McCoy is and confirm whether Pat McCoy is living or deceased.
- Staff 1-7 Please provide a copy of water Certificate of Convenience and Necessity No. 12367 issued by the Texas Commission on Environmental Quality or its predecessor agency.