



Control Number: 50041



Item Number: 15

Addendum StartPage: 0

2020 FEB 13 PM 1:00

APPLICATION BY
 AIRW 2017-7, L.P., A TEXAS
 LIMITED PARTNERSHIP,
 FOR A WATER CERTIFICATE
 OF CONVENIENCE AND
 NECESSITY

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BEFORE THE PUBLIC UTILITY
 COMMISSION OF TEXAS

APPLICANT'S SUPPLEMENTAL FILING IN RESPONSE TO ALJ ORDER NO. 3

TO THE HONORABLE ADMINISTRATIVE LAW JUDGE:

COMES NOW AIRW 2017-7, L.P., a Texas limited partnership ("Petitioner"), and files this supplement filing in response to the ALJ's Order No. 3 in this Docket No. 50041, and in support thereof would show the Executive Director as follows:

1. Once authorized to operate as a retail water utility within its certified service area in a designated CCN, applicant will bill and collect for the retail water service provided through the use of Master Meter Billing. Tenants of the two multi-family communities served by the utility (Lux of Prosper and Mansions of Prosper II) will pay for water through a component of their monthly rent. Applicant previously described the process as follows:
 - a. The tenants of the multi-family residential units within the two complexes to be served with water measured by the master meters from the Applicant's water system will be "charged separately" for water as part of monthly costs of the "tenancy" in the respective residential complexes. They will not individually be customers of Applicant and, therefore, will not be individually metered or billed by the Applicant for water. The Applicant will bill the respective complex owner based upon water volumes measured at one of two "master meters." The complex owner will then move the individual tenants of the complex for a pro rata share of the master metered cost based upon the "allocated utility service" methodology contemplated by Subchapter I, Chapter 24 of the PUC's Rules. See 16 TAC §§ 24.275 – 24.287.
 - b. Specifically, each individual "customer" as a tenant of the respective residential development will be receiving a charge for water service allocated to them as a part of their monthly costs of tenancy in the complex as authorized by

Subchapter I, of Chapter 24 of the PUC's Rules. As an incidence of their tenancy, the individual tenants in the respective master-metered complexes will be charged for a prorated share of the water provided to the complex through the applicable master meter billed to the owner by the utility provider.

2. To address Staff's inquiry regarding the names on the Bank Statements previously submitted in response to Staff's Requests for Information, attached hereto as Appendix "A" are to Organizational Charts that show the relationship between the Applicant and the related entities responsible for the two Customer Developments.
3. In response to Staff's request for a 5-year projection or budget for the project, attached here to as Appendices "B" and "C" are copies of (i) a 5-year projection of Revenues and Expenses for the Project (Appendix "B"), and (ii) a Rate Study prepared by Applicant's financial consultant B & D Environmental, Inc. (Appendix "C").
4. With respect to inquiries by Staff about the sources of the cash amounts for the Lux of Prosper (\$6,122,004) and for The Mansions of Prosper II (\$6,100,193) and how they were determined, the response is that Applicant has funded the projects with a 25% cash infusion as invested capital, and the 75% balance through loans from Wells Fargo Bank and Regions Bank, secured by Deeds of Trust on the two properties.
5. In January 21, 2020 the TCEQ Issued its letter of approval of the Applicant's North Custer Road Plant Water Distribution System for use in as a Public Water Supply System. A copy of the TCEQ Approval Letter is attached as Appendix "D".

CONCLUSION & PRAYER

WHEREFORE, PREMISES CONSIDERED, Petitioner AIRW 2017-7, L.P., respectfully requests that upon review of the enclosed supplemental materials in support of the Application that the Application be declared Administratively Complete such that the same can continue to be processed for final approval.

Respectfully submitted,

MCCARTHY & MCCARTHY, LLP
1122 Colorado St., Suite 2399
Austin, Texas 78701

By: /s/ Edmond R. McCarthy, Jr.
Edmond R. McCarthy, Jr.
State Bar No. 13367200
(512) 904-2313 (Tel)

(512) 692-2826 (Fax)
ed@ermlawfirm.com
ATTORNEYS FOR PETITIONER,
AIRW 2017-7, L.P., a Texas limited partnership

CERTIFICATE OF SERVICE

I hereby certify by my signature below, that on this the 14th day of February, 2020, a true and correct copy of the foregoing was:

- (i) electronically and manually filed with the Commission pursuant to Rule 22.74, and
- (ii) forwarded via postage prepaid regular first-class mail and/or e-mail, where available, to the Parties to Docket No. 50041 or their legal counsel at the locations shown on the attached service list.

/s/ Edmond R. McCarthy, Jr.
Edmond R. McCarthy, Jr.

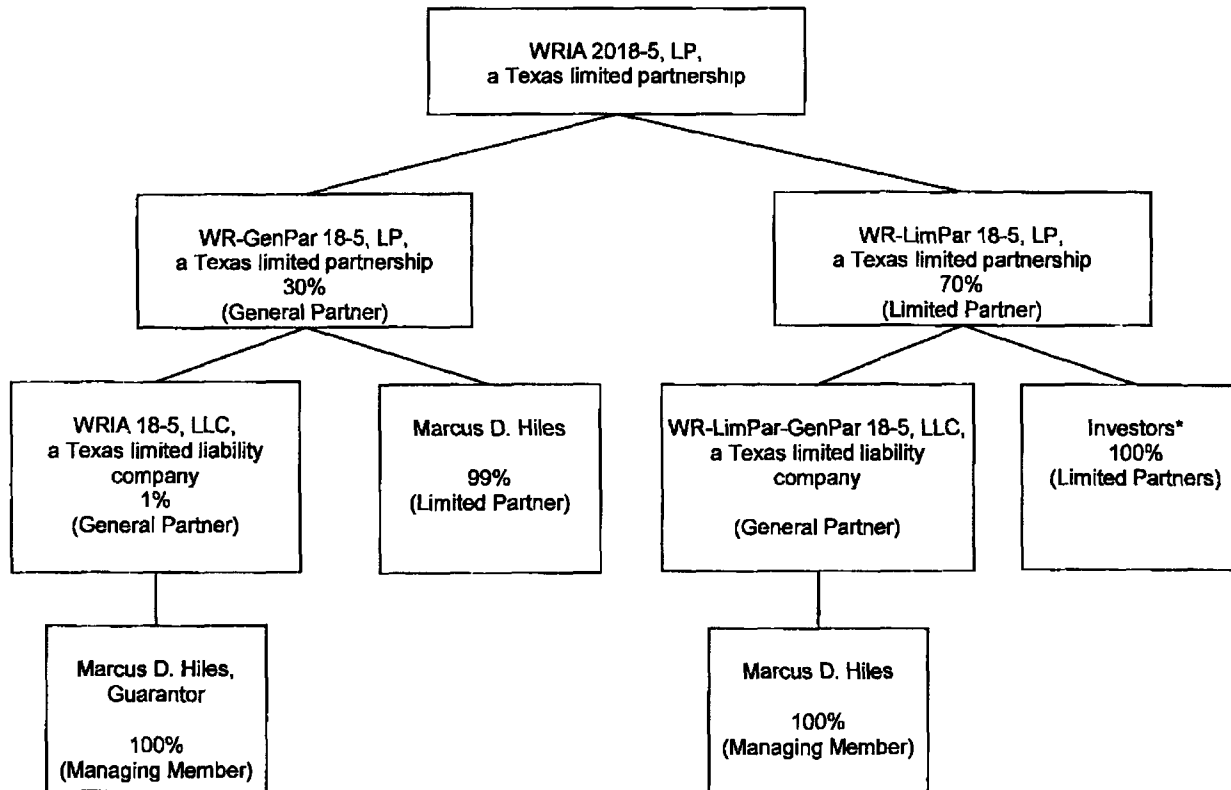
SERVICE LIST

Ms. Kourtnee Jinks Legal Division Public Utility Commission of Texas P.O. Box 13326 Austin, Texas 78711 Tel.: (512) 936-7265 Fax: (512) 936-7268 E-mail: kourtnee.jinks@puc.texas.gov	Representing Public Utility Commission of Texas – Legal Division
Wet Rock Groundwater Resources LLC Attn: Kaveh Khorzad 317 Ranch Road 620 South, Suite 203 Austin, TX 78734 Tel: (512) 773-3226 E-mail: k.khorzad@wetrockgs.com	Representing Petitioner - AIRW 2017-7, L.P., a Texas limited partnership

Appendix “A”

Organizational Charts

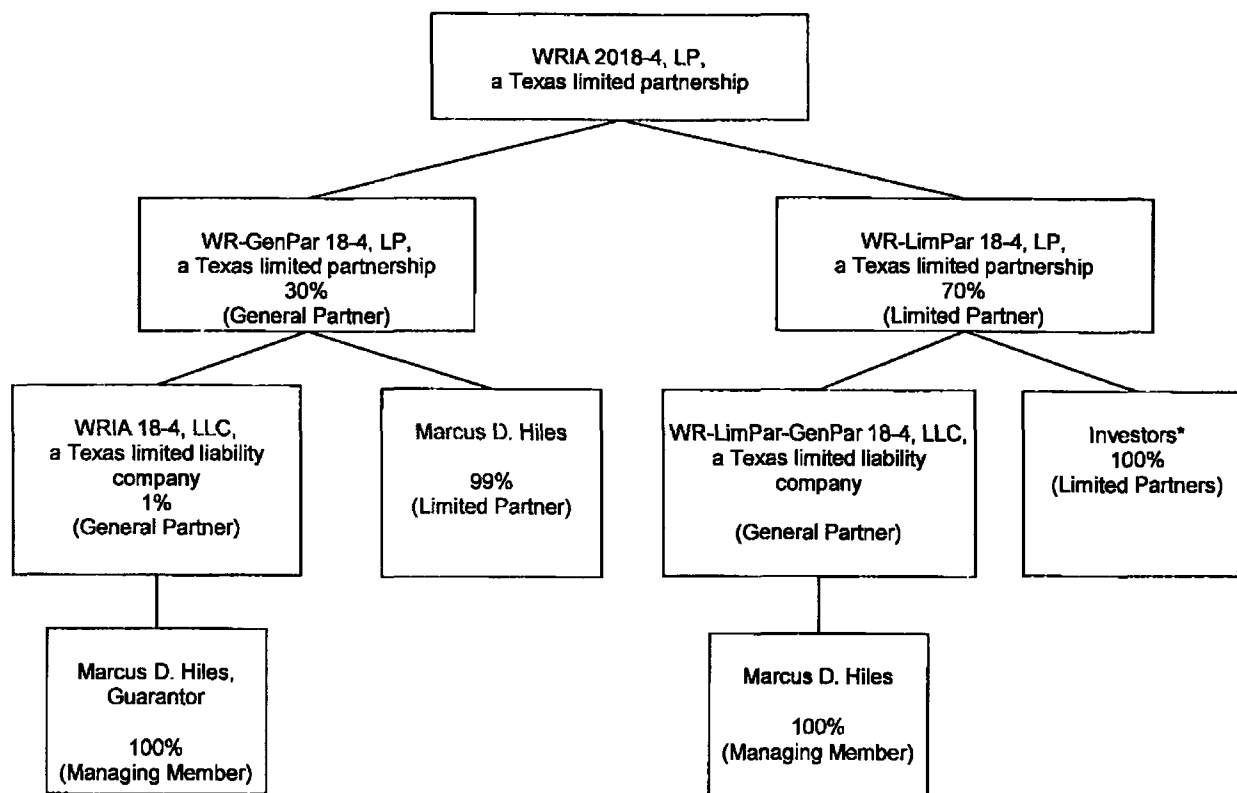
Luxe Prosper



***NO INDIVIDUAL INVESTOR OTHER THAN MDH HAS A 25% OR GREATER INTEREST**

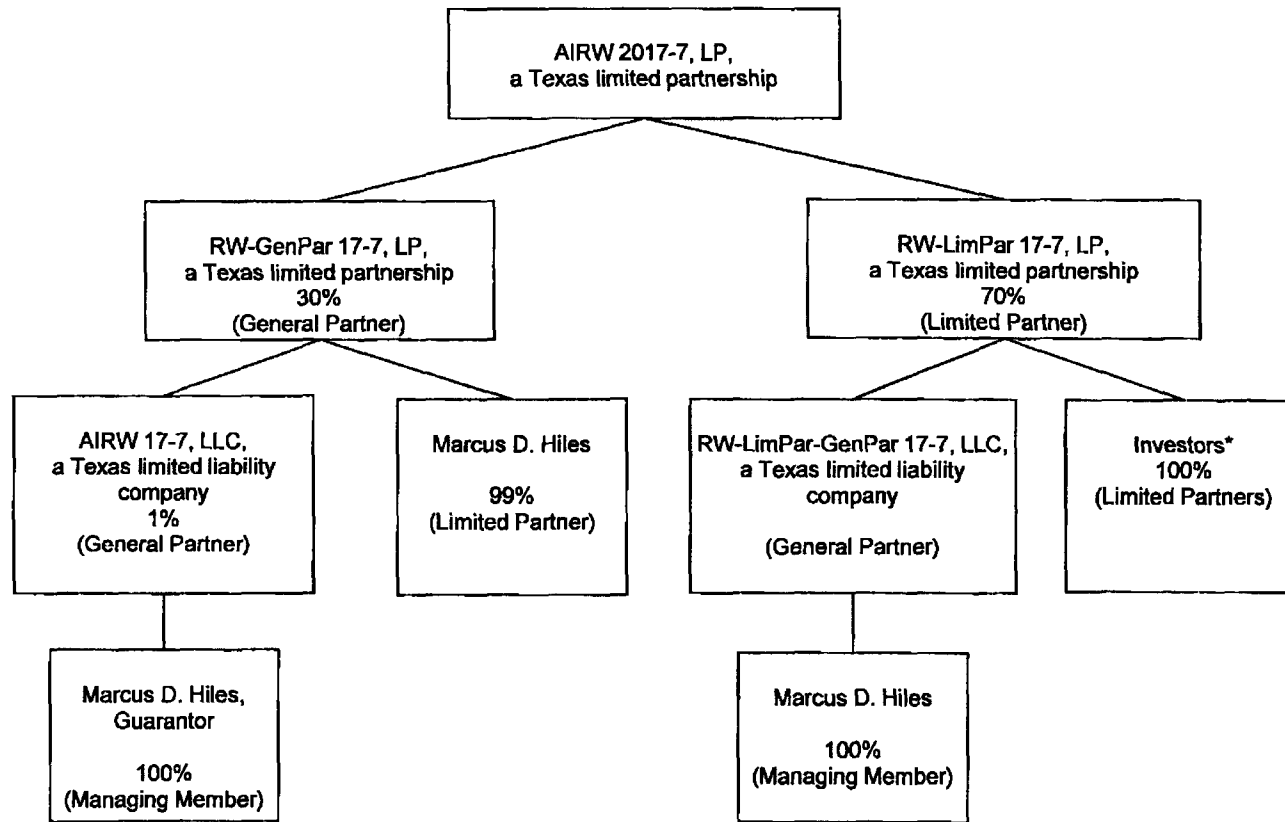
There are no non-US equity holders of any of these entities.

Mansions Prosper II



***NO INDIVIDUAL INVESTOR OTHER THAN MDH HAS A 25% OR GREATER INTEREST**

There are no non-US equity holders of any of these entities.



***NO INDIVIDUAL INVESTOR OTHER THAN MDH HAS A 25% OR GREATER INTEREST**

There are no non-US equity holders of any of these entities.

Appendix “B”

5-year projection of Revenues and Expenses for the Project

Appendix B: Projected Information

HISTORICAL BALANCE SHEETS (ENTER DATE OF YEAR END)	CURRENT(A) (12 - 31 - 18)	A-1 YEAR (12 - 31 - 19)	A-2 YEAR (12 - 31 - 21)	A-3 YEAR (12 - 31 - 22)	A-4 YEAR (12 - 31 - 23)	A-5 YEAR (12 - 31 - 24)
CURRENT ASSETS						
Cash	\$ 12,180.00	\$ 142,489.00	\$ 142,489.00	\$ 142,489.00	\$ 142,489.00	\$ 142,489.00
Accounts Receivable						
Inventories						
Income Tax Receivable						
Other						
A. Total Current Assets	\$ 12,180.00	\$ 142,489.00	\$ 142,489.00	\$ 142,489.00	\$ 142,489.00	\$ 142,489.00
FIXED ASSETS						
Land						
Collection/Distribution System						
Buildings						
Equipment		\$ 3,562,000.00	\$ 3,562,000.00	\$ 3,562,000.00	\$ 3,562,000.00	\$ 3,562,000.00
Other						
Less: Accum. Depreciation or Reserves		\$ 190,626.00	\$ 333,106.00	\$ 475,586.00	\$ 618,066.00	\$ 760,546.00
B. Total Fixed Assets		\$ 3,371,374.00	\$ 3,230,894.00	\$ 3,086,414.00	\$ 2,943,934.00	\$ 2,801,454.00
C. TOTAL Assets (A + B)	\$ 12,180.00	\$ 3,513,863.00	\$ 3,373,383.00	\$ 3,228,903.00	\$ 3,086,423.00	\$ 2,943,943.00
CURRENT LIABILITIES						
Accounts Payable						
Notes Payable, Current						
Accrued Expenses						
Other						
D. Total Current Liabilities	\$ 0.00	\$ 0.00	\$ 0.00	\$ 0.00	\$ 0.00	\$ 0.00
LONG TERM LIABILITIES						
Notes Payable, Long-term						
Other						
E. Total Long Term Liabilities	\$ 0.00	\$ 0.00	\$ 0.00	\$ 0.00	\$ 0.00	\$ 0.00
F. TOTAL LIABILITIES (D + E)	\$ 0.00	\$ 0.00	\$ 0.00	\$ 0.00	\$ 0.00	\$ 0.00
OWNER'S EQUITY						
Paid in Capital		\$ 3,562,000.00	\$ 3,562,000.00	\$ 3,562,000.00	\$ 3,562,000.00	\$ 3,562,000.00
Retained Equity		-\$ 190,626.00	-\$ 331,106.00	-\$ 475,586.00	-\$ 618,066.00	-\$ 760,546.00
Other	\$ 12,180.00					
Current Period Profit or Loss		\$ 142,489.00	\$ 142,489.00	\$ 142,489.00	\$ 142,489.00	\$ 142,489.00
G. TOTAL OWNER'S EQUITY	\$ 12,180.00	\$ 3,513,863.00	\$ 3,373,383.00	\$ 3,228,903.00	\$ 3,086,423.00	\$ 2,943,943.00
TOTAL LIABILITIES+EQUITY (F + G) = C	\$ 12,180.00	\$ 3,513,863.00	\$ 3,373,383.00	\$ 3,228,903.00	\$ 3,086,423.00	\$ 2,943,943.00
WORKING CAPITAL (A - D)	\$ 12,180.00	\$ 142,489.00	\$ 142,489.00	\$ 142,489.00	\$ 142,489.00	\$ 142,489.00
CURRENT RATIO (A / D)	N/A	N/A	N/A	N/A	N/A	N/A
DEBT TO EQUITY RATIO (F / G)	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000

PROJECTED NET INCOME INFORMATION

(ENTER DATE OF YEAR END)	CURRENT(A) (12 - 31 - 18)	A-1 YEAR (12 - 31 - 20)	A-2 YEAR (12 - 31 - 21)	A-3 YEAR (12 - 31 - 22)	A-4 YEAR (12 - 31 - 23)	A-5 YEAR (12 - 31 - 24)
METER NUMBER						
Existing Number of Taps	0	0	2	2	2	2
New Taps Per Year	0	2	0	0	0	0
Total Meters at Year End	0	2	2	2	2	2
METER REVENUE						
Revenue per Meter (use for projections)		\$ 161,676.00	\$ 161,676.00	\$ 161,676.00	\$ 161,676.00	\$ 161,676.00
Expense per Meter (use for projections)		\$ 90,432.00	\$ 90,432.00	\$ 90,432.00	\$ 90,432.00	\$ 90,432.00
Operating Revenue Per Meter	\$ 0.00	\$ 71,244.00	\$ 71,244.00	\$ 71,244.00	\$ 71,244.00	\$ 71,244.00
GROSS WATER REVENUE						
Revenues- Base Rate & Gallonage Fees		\$ 323,352.00	\$ 323,352.00	\$ 323,352.00	\$ 323,352.00	\$ 323,352.00
Other (Tap, reconnect, transfer fees, etc.)		\$ 0.00	\$ 0.00	\$ 0.00	\$ 0.00	\$ 0.00
Gross Income	\$ 0.00	\$ 323,352.00	\$ 323,352.00	\$ 323,352.00	\$ 323,352.00	\$ 323,352.00
EXPENSES						
General & Administrative (see schedule)						
Operating (see schedule)		\$ 180,863.00	\$ 180,863.00	\$ 180,863.00	\$ 180,863.00	\$ 180,863.00
Interest						
Other (list)						
NET INCOME	\$ 0.00	\$ 142,489.00	\$ 142,489.00	\$ 142,489.00	\$ 142,489.00	\$ 142,489.00

PROJECTED EXPENSE DETAIL	YEAR 1	YEAR 2	YEAR 3	YEAR 4	YEAR 5	TOTALS
GENERAL/ADMINISTRATIVE EXPENSES						
Salaries						
Office						
Computer						
Auto						
Insurance						
Telephone						
Utilities						
Depreciation						
Property Taxes						
Professional Fees						
Other						
Total	\$ 0.00	\$ 0.00	\$ 0.00	\$ 0.00	\$ 0.00	
% Increase Per projected Year	0%	0%	0%	0%	0%	0%
OPERATIONAL EXPENSES						
Salaries						
Auto						
Utilities						
Depreciation						
Repair & Maintenance						
Supplies						
Other	\$ 180,863.00	\$ 180,863.00	\$ 180,863.00	\$ 180,863.00	\$ 180,863.00	
Total	\$ 180,863.00	\$ 180,863.00	\$ 180,863.00	\$ 180,863.00	\$ 180,863.00	

PROJECTED SOURCES AND USES OF CASH STATEMENTS	YEAR 1	YEAR 2	YEAR 3	YEAR 4	YEAR 5	TOTALS
SOURCES OF CASH						
Net Income						
Depreciation (If funded by revenues of system)	\$ 142,480.00	\$ 142,480.00	\$ 142,480.00	\$ 142,480.00	\$ 142,480.00	
Loan Proceeds						
Other						
Total Sources	\$ 142,480.00	\$ 142,480.00	\$ 142,480.00	\$ 142,480.00	\$ 142,480.00	
USES OF CASH						
Net Loss						
Principle Portion of Pmts.						
Fixed Asset Purchase						
Reserve						
Other						
Total Uses	\$ 0.00	\$ 0.00	\$ 0.00	\$ 0.00	\$ 0.00	
NET CASH FLOW	\$ 142,480.00	\$ 142,480.00	\$ 142,480.00	\$ 142,480.00	\$ 142,480.00	
DEBT SERVICE COVERAGE						
Cash Available for Debt (CADS)						
A: Net Income (Loss)						
B: Depreciation, or Reserve Interest	\$ 142,480.00	\$ 142,480.00	\$ 142,480.00	\$ 142,480.00	\$ 142,480.00	
C: Total CADS (A + B = C)	\$ 142,480.00	\$ 142,480.00	\$ 142,480.00	\$ 142,480.00	\$ 142,480.00	
D: DEBT SERVICE						
Annual Principle Plus Interest	\$ 0.00	\$ 0.00	\$ 0.00	\$ 0.00	\$ 0.00	
E: DEBT SERVICE COVERAGE RATIO						
CADS Divided by DS (E = C / D)	N/A	N/A	N/A	N/A	N/A	

Appendix “C”

Rate Study

B & D ENVIRONMENTAL, INC.

200 HARBOR CIRCLE
GEORGETOWN, TEXAS 78633
PHONE NO: (512) 917-7541
FAX NO: (512) 692-1967

EMAIL: bretfenner@yahoo.com

November 20, 2019

Mr. Matthew Hiles
Executive Vice President
W3
2505 N. State Hwy 360, Suite 800
Grand Prairie, Texas 75050

RE: A Rate Study to Determine the Proposed Water Rates in the Application of AIRW 2017-7. LP to Obtain a Water Certificate of Convenience and Necessity (CCN) in Collin County

Dear Mr. Hiles:

B & D Environmental, Inc. was retained to perform a study to determine a rate structure that will support the revenue requirement for a proposed public water system supplied by the North Custer Road Plant. This rate study is being revised based on additional information provided by the utility and from the Application to Obtain a Water CCN, Docket No. 50041. Data used in conducting this rate study can be found in **Attachment 1** and utility's CCN application. Since this utility will be requesting a new CCN a number of assumptions were required to determine a revenue requirement necessary to support the cost of water service to this development. A list of these assumptions can be found in **Attachment 2** of this study.

Based on the available information, a revenue requirement was determined for providing water service to the utility's customer at the end of year one. The projected construction timeline in the application indicates that the system would be completed and providing service within one year. A projected revenue requirement was calculated based on full build out at the end of year one, 2020. The utility will be servicing two eight-inch diameter master meters which each will serve 464 units. A monthly water rates structure per connection was calculated to generate enough income to cover the required cost of service. The calculation of the revenue requirement and a connection monthly rate structure can be found in **Attachment 3** of this study. The recommended rate structure in Attachment 3 rates should recover the revenue requirement necessary for providing water service to the customers of this utility based on estimated cost. The utility will be required to submit a Rate/Tariff Change Application within 18 months after approval of the requested CCN to support the its revenue requirement once an actual years' worth of cost of service expenses has been determined.

In conclusion, the water rate structure as calculated in Attachment 3 of this study should be used in the utility's CCN application and proposed water tariff. This rate structure should generate a revenue requirement that will cover the projected cost of service expenses based on the total number of connections without an over recover of revenues. Table 1 is the recommended rate structure for the utility.

Table 1: Recommended Water Rate Structure

Monthly Minimum Fee:		
	8" Meter	\$ 9,027 per meter
Gallonage Charges:		
	All Gallons	\$ 1.60 per 1,000 gallons

Rate designed with zero gallons included in the base rate

Should you have any questions regarding this rate study, please contact me at (512) 917-7541.

Sincerely,



Bret W. Fenner, P.E.
B & D Environmental, Inc.

ATTACHMENT 1

From: K Khorzad
Sent: Wednesday, November 6, 2019 11:48 AM
To: Bret Fenner
Subject: AIRW 2017-7, LP

Bret,

Attached are the engineer's estimated cost for the two units (Luxe and Mansions). So total cost for the water system is as follows:

2 Water Wells

<i>C Miller Drilling (Low Bid)</i>	\$1,712,000
Layne Granite	\$3,348,200

Water Treatment Plant

<i>Fryer Construction (Low Bid)</i>	\$1,850,000
Dake Construction	\$2,420,700

Total for Water System

Wells	\$1,712,000
Water Plant	\$1,850,000
TOTAL COST	\$3,562,000

Kaveh Khorzad, P.G. - President
Wetrock Groundwater Services, LLC
Groundwater Specialists
TBPG Firm No: 50038
317 Ranch Road 620 South, Suite 203
Austin, Texas 78734 Ph: 512-773-3226
www.wetrockgs.com

ATTACHMENT 2

Assumptions:

1. Each unit will use an average of 6,000 gallons per month.
2. All water utility plant facilities will be considered developer contributions thus no return on investment component included in cost of service. The distribution system will be owned and maintained by customer and excluded from the depreciation schedule.
3. The estimated total cost of the water system plant and equipment will be \$3,562,000
4. Per the application, the facilities will be completed within the first year. Thus, full build out of the 924 units will be considered completed within one year.

ATTACHMENT 3

North Custer Road Plant

Water Rate Design Study

Test Period Connections

Metered Connections:

<u>Meter Size</u>	<u>Total Meters</u>	<u>Duplex Units per Meter</u>	<u>Total Duplex Units</u>
5/8" - 3/4"	0	0	0
1"	0	0	0
1 1/2"	0	0	0
2"	0	0	0
3"	0	0	0
8"	2	462	924
Totals:	2		924

Estimated Annual Total Gallons Sold: 6,000 per connection per month x 924 connections x 12 months = 66,528,000

O & M Expense Calculation:

Monthly Minimum Charge:

\$3,604.80 per 8" meter x 2 each x 12 months	\$	86,515	\$	86,515
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Gallonge Charge:

1 - 5,000 gallons: 5 x \$2.85 x 2 each x 12 months	\$	342		
5,001- 10,000 gallons: 5 x \$4.95 x 2 each x 12 months	\$	594		
10,000 - 20,000 gallons: 10 x \$7.13 x 2 each x 12 months	\$	1,711		
Over 20,000 gallons:[66,528 - (20 x 2 each x 12 months)]	\$	66,048		
			\$	68,695

Regional Pass Thru Charge:

66,528,000 gallons ÷ 1000 gallons x \$0.3856 per unit	\$	25,653		
			\$	25,653
Total:			\$	180,863

Estimated Water Revenue Requirement:

Water Cost of Service:

O & M Expenses	\$	180,863		
Subtotal:			\$	180,863
Annual Depreciation	\$	142,480		
Return On Investment	\$	0		
Subtotal:			\$	142,480

Total Water Revenue Requirement: \$ 323,343

Water Rate Structure Per Master Meter:

Monthly Minimum Charge:

Fixed Cost Calculation: \$323,343 x .67 = \$216,640

Base Rate Calculation: \$216,640 ÷ 924 units ÷ 12 months = \$19.54 per unit

<u>Meter Size</u>	<u>Units per Meter</u>	<u>Monthly Fee / Meter</u>
8"	462	\$ 9,027

Gallonge Charge per 1,000 gallons:

Variable Cost Calculation: \$323,343 x .33 = \$106,703 ÷ 2 = \$53,352

Gallonge Units 33,264,000 Gals. ÷ 1000 = 33,264

Variable Cost Calculation: 53,352 ÷ 33,264 = \$ 1.60 per 1000 gallons

North Custer Road Plant

Depreciation Schedule						
Test Period Ends:		31-Dec-20				
Utility Plant Cost	Installation Date	Original Cost	Average Service Life	Annual Deprec. Expense	Total Accum. Deprec.	Net Book Value
Wells	1-Sep-19	\$1,712,000	30	\$68,480	\$91,620	\$1,620,380
Water Plant	1-Sep-19	\$1,850,000	30	\$74,000	\$99,005	\$1,750,995
Utility Plant Totals:		\$3,562,000		\$142,480	\$190,626	\$3,371,374

Notes:

Note 1. Cost of water utility plant from lowest bid.

Note 2. All water utility plant considered developer contributions thus no return on investment included in cost of service.

Note 3. Rate structure allocated: Fixed cost 67% and variable cost 33%. No gallons included in the base rate.

Appendix “D”

January 21, 2020 TCEQ Approval Letter For North Custer Road Plant Water Distribution System

Jon Niermann, Chairman
Emily Lindley, Commissioner
Bobby Janecka, Commissioner
Toby Baker, Executive Director

PWS_0430077_CO_20200121_Plan Ltr

TEXAS COMMISSION ON ENVIRONMENTAL QUALITY

Protecting Texas by Reducing and Preventing Pollution

January 21, 2020

Mr. Randall Eardley, P.E.
Wier & Associates, Inc.
2201 East Lamar Boulevard, Suite 200E
Arlington, TX 76006

RECEIVED

JAN 27 2020

WIER & ASSOC. - ARL

Re: North Custer Road Plant - Public Water System ID No. 0430077
Proposed Distribution System - North Custer Road Plant
Engineer Contact Telephone: (817) 467-7700
Plan Review Log No. P-11222019-164
Collin County, Texas

CN: 605607753; RN: 110835733

Dear Mr. Eardley:

On November 22, 2019, the Texas Commission on Environmental Quality (TCEQ) received planning material with your letter dated November 21, 2019 for the proposed distribution system - North Custer Road Plant. Based on our review of the information submitted, the project generally meets the minimum requirements of Title 30 Texas Administrative Code (TAC) Chapter 290 - Rules and Regulations for Public Water Systems and is **approved for construction**.

Please note, as of this date, well completion has not been approved.

The submittal consisted of 13 sheets of engineering drawings and technical specifications. The approved project consists of:

- Approximately 851 linear feet (lf) of 6-inch, American Water Works Association (AWWA) Standard C900, dimension ratio (DR) 14, polyvinyl chloride (PVC) pipe;
- Approximately 17,407 lf of 8-inch, AWWA Standard C900, DR 18, PVC pipe;
- Approximately 1,984 lf of 12-inch, AWWA Standard C900, DR 18, PVC pipe; and,
- Various valves, fittings, and appurtenances.

This approval is for the construction of the above listed items only. Any wastewater components contained in this design were not considered.

The North Custer Road Plant public water supply system provides water treatment.

The project is located southwest from the intersection of Bloomdale Road and County Road 124 in Collin County, Texas.

Mr. Randall Eardley, P.E.
Page 2
January 21, 2020

An appointed engineer must notify the TCEQ's Region 4 Office in Dallas/Fort Worth at (817) 588-5800 when construction will start. Please keep in mind that upon completion of the water works project, the engineer or owner will notify the commission's Water Supply Division, in writing, as to its completion and attest to the fact that the completed work is substantially in accordance with the plans and change orders on file with the commission as required in 30 TAC §290.39(h)(3).

Please refer to the Plan Review Team's Log No. **P-11222019-164** in all correspondence for this project.

Please complete a copy of the most current Public Water System Plan Review Submittal form for any future submittals to TCEQ. Every blank on the form must be completed to minimize any delays in the review of your project. The document is available on TCEQ's website at the address shown below. You can also download the most current plan submittal checklists and forms from the same address.

<https://www.tceq.texas.gov/drinkingwater/udpubs.html>

For future reference, you can review part of the Plan Review Team's database to see if we have received your project. This is available on TCEQ's website at the following address:

<https://www.tceq.texas.gov/drinkingwater/planrev.html/#status>

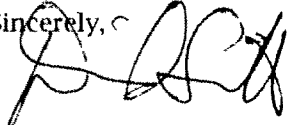
You can download the latest revision of 30 TAC Chapter 290 - Rules and Regulations for Public Water Systems from this site.

Mr. Randall Eardley, P.E.
Page 3
January 21, 2020

If you have any questions concerning this letter or need further assistance, please contact Ms. Fatima Selami at (512) 239-5259 or by email at Fatima.Selami@tceq.texas.gov. If you are unable to contact Ms. Selami, please contact another member of the Plan Review Team at (512) 239-4691 or by correspondence at the following:

Plan Review Team, MC-159
Texas Commission on Environmental Quality
P.O. Box 13087
Austin, Texas 78711-3087

Sincerely,



David T. Smith, P.E.
Plan Review Team
Plan and Technical Review Section
Water Supply Division
Texas Commission on Environmental Quality



Vera Poe, P.E., Team Leader
Plan Review Team
Plan and Technical Review Section
Water Supply Division
Texas Commission on Environmental Quality

VP/DTS/fs/SS

cc: North Custer Road Plant, Attn: Mr. Marcus Hiles, Director, 2505 North State Highway
360, Suite 800, Grand Prairie, TX 75050-7803