



Control Number: 50324



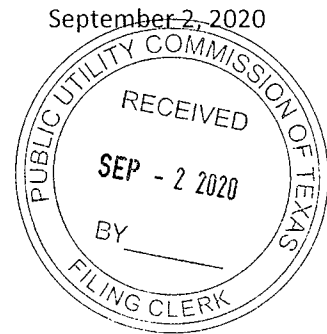
Item Number: 18

Addendum StartPage: 0



Public Utility Commission of Texas
1701 North Congress Avenue
P. O. Box 13326
Austin, Texas 78711-3326

RE: Sewer CCN Application – County Line Special Utility District
PUC Docket No. 50324
SWE Project No. 0017-059-18



To Whom It May Concern,

On behalf of our client, County Line SUD, we are responding to the PUC Staff's Final Recommendation regarding the proposed sewer CCN boundary for County Line SUD dated August 28, 2020. We respectfully disagree with the staff's recommendation to reduce the proposed boundary from 17,972 acres to 7,890 acres to only encompass the properties that have requested wastewater service to date.

In addition to the justifications presented in our August 18 letter to the PUC, we would like to address the staff's more recent statement that special utility districts are not required to possess a CCN to provide services. County Line SUD understands that they are able to provide service to properties outside their CCN boundary. However, this approach would result in County Line SUD investing a significant amount of money to oversize their wastewater infrastructure to accommodate properties that they may not ever serve. Or if they choose not to oversize their infrastructure now, the amount of money needed to expand/upgrade that infrastructure in the future may likely be cost-prohibitive to future developments. This makes the planning and design of future capital improvements exceedingly difficult and is a significant financial risk to County Line SUD and its ratepayers. This is especially true considering that this is a new wastewater system and development is just now expanding into this area.

Furthermore, the PUC's proposed 7,890-acre boundary would result in a CCN consisting of at least 5 or 6 individual boundaries with numerous "holes" in the middle, as many of the properties that have requested service are not contiguous.

However, County Line SUD does understand the PUC's current position and is willing to work with the staff to reduce the original 17,972-acre boundary to something more agreeable to both parties. Therefore, we have enclosed an exhibit illustrating a potential modification to the CCN boundary that would reduce its area to approximately 11,648 acres (contained in one continuous boundary) and would allow for some growth in areas where significant infrastructure is currently planned (specifically a new WWTP on Tract 17 for which a discharge permit WQ0015635002 was just approved a few weeks ago).

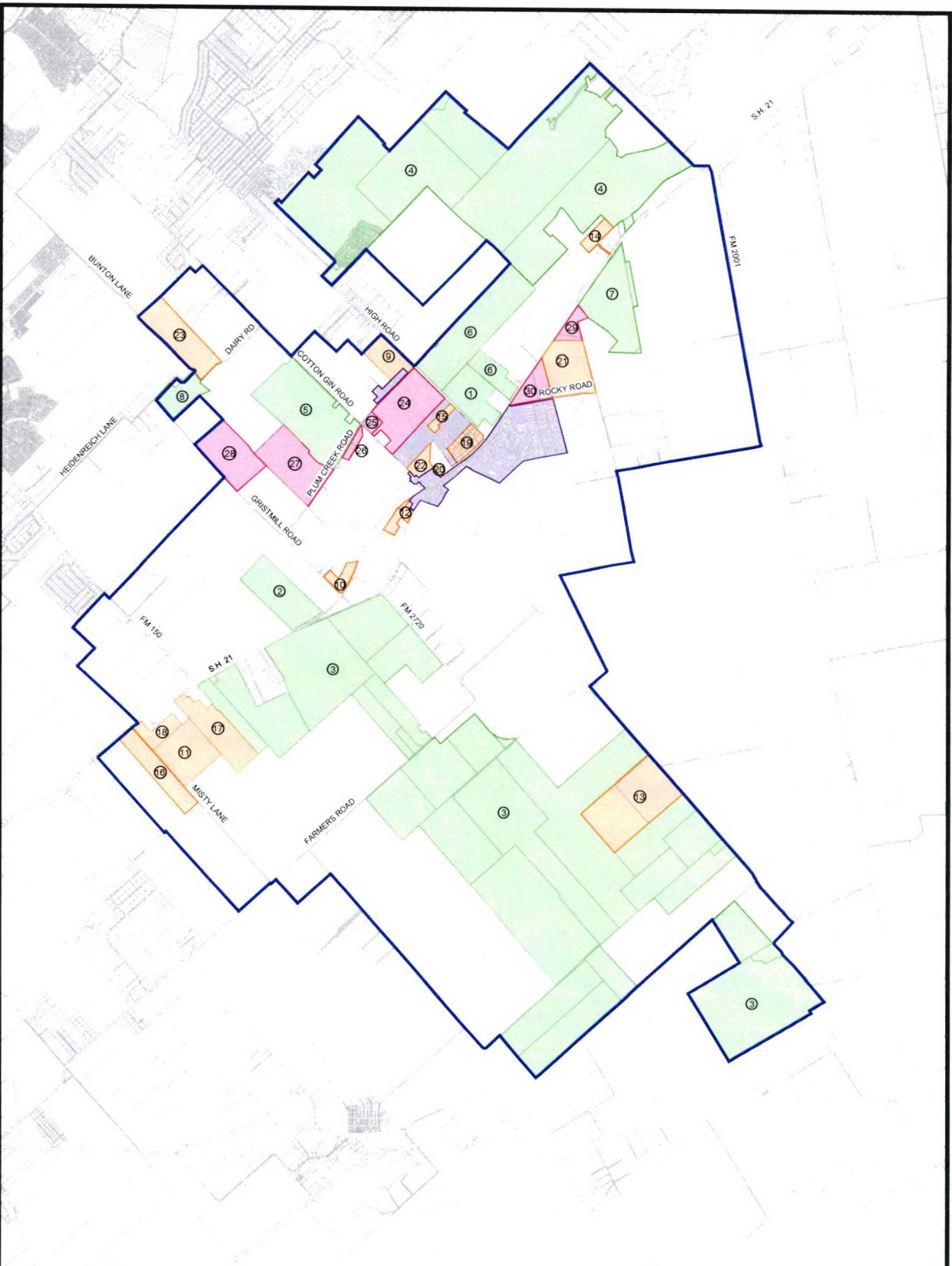
Therefore, we respectfully request that the PUC consider this supplemental information and modified boundary for the County Line SUD Sewer CCN. If you have any questions or need additional information, please do not hesitate to contact me at (830) 672-7546 or allison.nieto@swengineers.com.

Respectfully submitted,

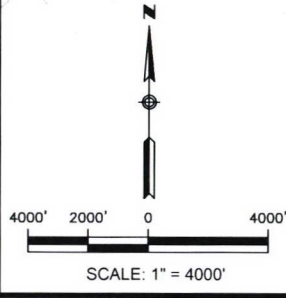
Allison Nieto

Allison M. Nieto, P.E.

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- LEGEND**
- SUBMITTED SERVICE REQUEST TO PUC WITH INITIAL APPLICATION
 - REQUESTS SINCE RECEIVED
 - LANDOWNER HAS GIVEN EASEMENT
 - EXISTING CITY OF UHLAND RESIDENTS
 - ORIGINAL CCN BOUNDARY

**COUNTY LINE SUD
ORIGINAL SEWER CCN
AUGUST 2020**



**Southwest
Engineers**

TBPE NO. F-1909
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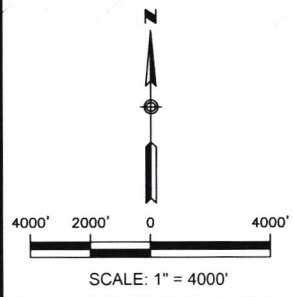
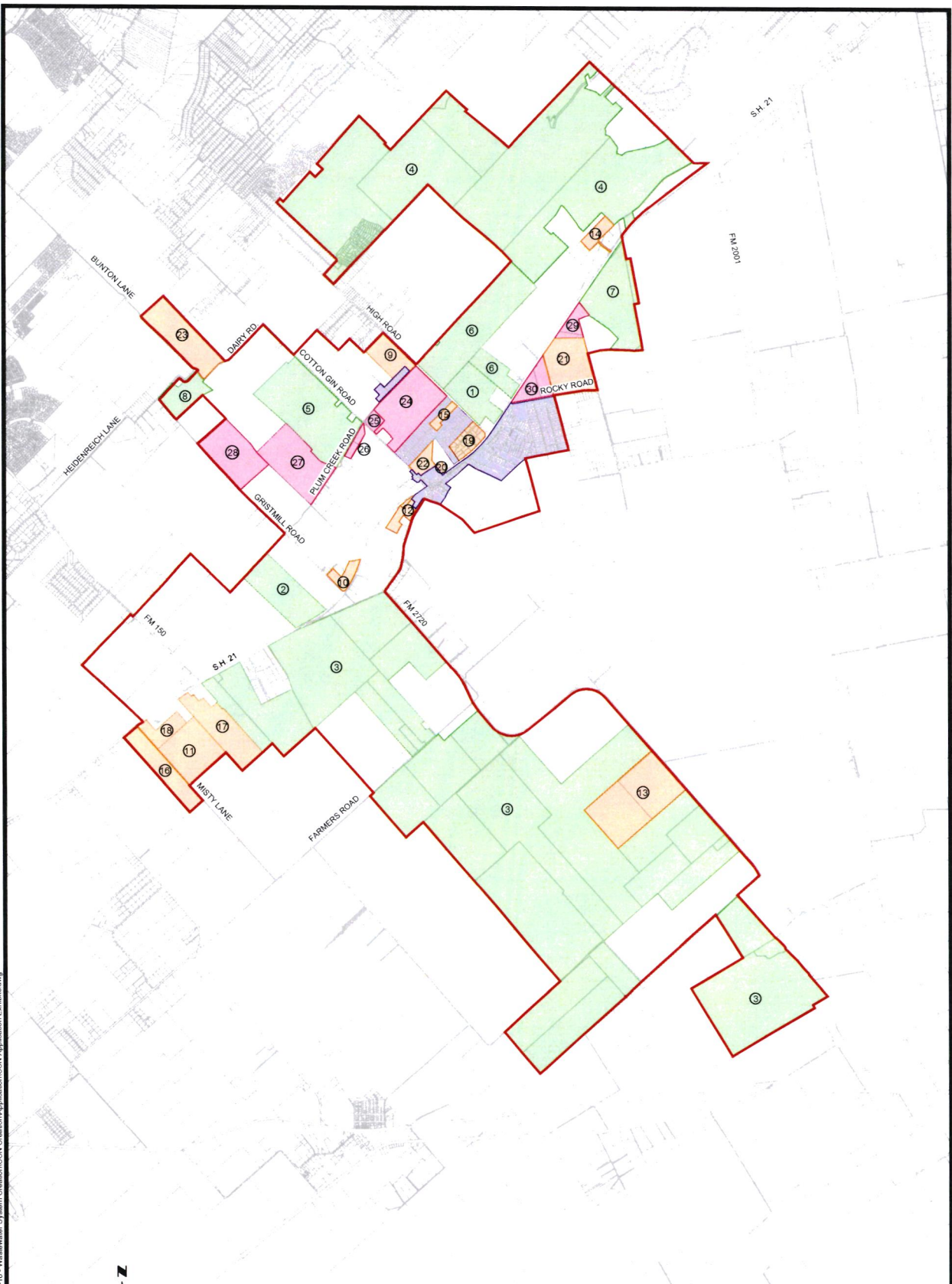
HEADQUARTERS

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CENTRAL TEXAS

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P: 512.312.4336

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- LEGEND**
- SUBMITTED SERVICE REQUEST TO PUC WITH INITIAL APPLICATION
 - REQUESTS SINCE RECEIVED
 - LANDOWNER HAS GIVEN EASEMENT
 - EXISTING CITY OF UHLAND RESIDENTS
 - MODIFIED CCN BOUNDARY

**COUNTY LINE SUD
MODIFIED SEWER CCN**

SEPTEMBER 2020



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