



Control Number: 50721



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SOAH DOCKET NO. 473-21-0946.WS
PUC DOCKET NO. 50721

2021 MAY 12 PM 12:19

APPLICATION OF CRYSTAL CLEAR § BEFORE THE STATE OFFICE
WATER, INC. FOR AUTHORITY TO § OF
CHANGE RATES § ADMINISTRATIVE HEARINGS

**CRYSTAL CLEAR WATER, INC.'S RESPONSE TO
COMMISSION STAFF'S THIRD REQUEST FOR INFORMATION**

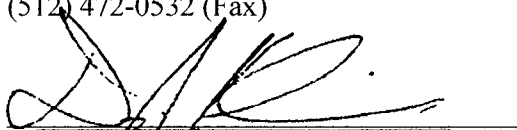
To: Public Utility Commission of Texas (Commission), by and through its attorney of record,
Rustin Tawater, Legal Division, 1701 N. Congress Avenue, P.O. Box 13326, Austin,
Texas 78701.

COMES NOW, Crystal Clear Water, Inc. ("CCWI"), by and through its undersigned
attorneys of record, files its Response to Public Utility Commission Staff's Third Request for
Information ("RFI") to Crystal Clear. This response is timely filed. Pursuant to 16 Tex. Admin.
Code ("TAC") § 22.144(c)(2)(F), Crystal Clear agrees and stipulates that all parties may treat the
responses as if the answers were filed under oath.

Respectfully submitted,

**LLOYD GOSSELINK ROCHELLE &
TOWNSEND, P.C.**

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**ATTORNEYS FOR CRYSTAL CLEAR
WATER, INC.**

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CERTIFICATE OF SERVICE

I 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 May 12, 2021, in accordance with the Order Suspending Rules, issued in Project No. 50664.

A handwritten signature in black ink, appearing to read 'D. Klein', is written over a horizontal line.

David J. Klein

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Staff 3-1 Please provide additional information regarding the items paid on 11/19/2019 & 12/30/2019 paid to TCEQ “First Payment” & “Second Payment,” respectively.

RESPONSE: The 11/19/2019 “First Payment” and 12/30/2019 “Second Payment” listed on page 208 of the General Ledger (previously provided as CCWI Exhibit 2-1), were payments made to the Texas Commission on Environmental Quality (“TCEQ”) under an Agreed Order. TCEQ allowed CCWI to make these payments in monthly installments, rather than in full, because doing otherwise would place financial hardship on CCWI due to its low rates and lack of working capital.

Prepared by: Robert Payne, President of CCWI
Sponsored by: Robert Payne, President of CCWI

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Staff 3-2 Please admit or deny the billing software has been purchased. If admit, provide the date of the purchase.

RESPONSE: Deny. CCWI has not yet purchased the software and printer listed under Known & Measurable items because of its current limited cash flow. However, it intends to do so at its earliest opportunity.

Prepared by: Robert Payne, President of CCWI
Sponsored by: Robert Payne, President of CCWI