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PUC DOCKET NO. 50721

APPLICATION OF CRYSTAL CLEAR	§	PUBLIC UTILITY COMMISSION
WATER, INC. FOR AUTHORITY TO	§	OF TEXAS
CHANGE RATES	§	

**JOINT RESPONSE TO COMMISSION COUNSEL MEMORANDUM, MOTION TO
ADMIT EVIDENCE, AND MOTION FOR GOOD CAUSE EXCEPTION**

COMES NOW, Crystal Clear Water, Inc. (CCWI) and the Staff of the Public Utility Commission of Texas (Commission Staff), by and through their undersigned attorneys of record, and file this Joint Response to Commission Counsel Memorandum (the Response), Motion to Admit Evidence (the Motion to Admit), and Motion for Good Cause Exception (the Motion for Exception) in this Docket, and in support thereof, would respectfully show as follows:

I. BACKGROUND

On April 8, 2020, CCWI, a Class D utility, filed with the Commission its application for authority to change rates (the Application) under Texas Water Code (TWC) § 13.1872(c)(2). The Commission referred the Application to the State Office of Administrative Hearings (SOAH) on December 3, 2020. On July 15, 2021, all parties to the proceeding reached a unanimous agreement on rates and fees, and the mediators reported to the presiding SOAH Administrative Law Judge (ALJ) that the parties had reached an agreement in principle. CCWI, Commission Staff, and the intervenors, through their duly authorized representatives, then executed a Unanimous Stipulation and Settlement Agreement (the Settlement Agreement). The parties submitted a Joint Motion to Admit Evidence and Remand to the Public Utility Commission (Joint Motion), including the Settlement Agreement and the agreed proposed Tariff, to SOAH on September 3, 2021. The SOAH ALJ issued Order No. 5 on September 7, 2021, admitting the Settlement Agreement and documents supporting the Settlement Agreement into evidence and remanding the case to the Commission.

On October 21, 2021, Commission Counsel filed a Memorandum requesting evidentiary support for CCWI's rate case expenses. CCWI filed its response on November 12, 2021, explaining that the rate case expenses and 12-month recovery period were settled upon after prolonged negotiations. CCWI also included in its response the Affidavit of David Klein, attorney for CCWI, supporting the reasonableness of the agreed-upon rate case expenses. The Commission ALJ issued Order No. 11 on November 15, 2021, admitting the Affidavit of David Klein into evidence.

Then, on November 12, 2021, Commission Counsel filed a Memorandum (the Memo), identifying three evidentiary issues for CCWI to address: (i) the consolidation of the public water systems of Lakeline Acres, Glenshores, Airport Addition, and Whispering Ridge under a single tariff; (ii) the provision of notice to the Office of Public Utility Counsel (OPUC); and (iii) whether CCWI has any affiliates. The Memo requests that CCWI either identify evidence in the record or otherwise address these issues. Under the current procedural schedule, such additional evidence is due by March 7, 2022. Thus, this Response, Motion to Admit, and Motion for Exception are timely filed.

II. RESPONSE TO THE MEMO, MOTION TO ADMIT, AND MOTION FOR EXCEPTION

A. Response regarding Consolidation of Multiple Systems and Motion to Admit

The evidence in the record and additional evidence provided in this Response demonstrate support the ordering provision that consolidates CCWI's separate tariffs for its public water systems, Lakeline Acres, Glenshores, Airport Addition, and Whispering Ridge (the Systems), into a single tariff, as permitted under 16 Tex. Admin. Code § 24.25(k). As noted by the PUC in the Memo, a utility may consolidate its tariff and rate design for more than one system if (i) the systems under the tariff "are substantially similar in terms of facilities, quality of service, and cost of

service;” and (ii) “the tariff provides for rates that promote water conservation for single-family residences and landscape irrigation.” Evidence supporting these factors is provided and cited as follows.

1. Substantially Similar Public Water Systems

As to the issue of substantially similar facilities, the Commission found in Docket No. 50200 that the utility had substantially similar facilities because its public water systems were all groundwater systems and mostly served by wells on-site, having “the same maintenance requirements for their wells, storage tanks, pump houses, distribution mains, and all associated equipment needed to produce, store, and distribute water.”¹ Here, the Systems all utilize groundwater produced from wells. The also record contains evidence that the Systems have the same maintenance requirements for their wells, storage tanks, treatment plants, distribution mains, and all associated equipment necessary to produce, store, and distribute water.² In further support of this explanation, attached hereto as Attachment A is each of the Systems’ Water System Facilities information from the Texas Commission of Environmental Quality’s (TCEQ) Drinking Water Watch database. CCWI requests that Attachment A be admitted into evidence in this Docket. Last, the Application, already a part of the evidentiary record, contains evidence demonstrating that each System has similar facilities, as each of CCWI’s water systems primarily serve small residential customers with residential-sized 5/8” x 3/4” meters.³

¹ *Application of Undine Texas, LLC and Undine Texas Environmental, LLC for Authority to Change Rates*, Docket No. 50200, Order, at 10-11 (November 5, 2020).

² *See Joint Motion to Admit Evidence and Remand to the Public Utility Commission*, Attachment C (Sept. 3, 2021).

³ Crystal Clear Water, Inc. Revised Water Rate Increase with Attachments, Schedule I-3 (Aug. 19, 2020). 239 of CCWI’s 230 connections are residential-sized 5/8” x 3/4” meters. *See also*, Crystal Clear Water, Inc. Revised Water Rate Increase with Attachments, Adrian Correspondence at 1 (Aug. 19, 2020). Lakeline Acres has 120 connections, Glenshores has 26 connections, Airport Addition has 55 connections, and Whispering Ridge has 30 connections.

The Systems are also substantially similar in terms of quality of service. In Docket No. 50200, the Commission found that the utility's public drinking water systems had substantially similar quality of service because they were subject to the same regulations.⁴ Since the Systems are public drinking water systems serving residential customers with treated groundwater, the Systems are subject to the same regulations.⁵ Therefore, the Systems are substantially similar in terms of quality of service.

Last, the Systems are substantially similar in terms of cost of service. Here, CCWI filed a set of documents on August 19, 2020, labeled "Crystal Clear Water, Inc. Revised Water Rate Increase with Attachments," including a document labeled "Adrian Correspondence," attached hereto as Attachment B (the Expense Sheet). This filing already has been admitted into evidence in this Docket, but Attachment B is provided hereto for the Commission's convenience. The Expense Sheet explains that CCWI's meter breakdown for each system for the test year were as follows: (i) Lakeline Acres – 120 connections; (ii) Glenshores – 26 connections; (iii) Airport Addition – 55 connections; and (iv) Whispering Ridge – 30 connections. Further, the Expense Sheet provides the total sales and total expense for each system during the test year.⁶ Commission Staff accepted the Expense Sheet as evidence that the Systems are substantially similar. Provided below is the calculation for total sales, sales per connection, total expense, and expense per connection for each system, based upon data in the Expense Sheet, demonstrating the demand for water and O&M cost-per-meter for each system for the test year.

⁴ *Id.* at 11.

⁵ See Attachment A.

⁶ *Crystal Clear Water, Inc. Revised Water Rate Increase with Attachments, Adrian Correspondence* at 2 (Aug. 19, 2020).

	Total Sales	Sales Per Connection	Total Expense	Expense Per Connection
Lakeline Acres 120 connections	\$30,309.41	\$252.58	\$38,363.42	\$319.70
Glenshores 26 connections	\$8,869.10	\$341.12	\$9,887.53	\$380.29
Airport Addition 55 connections	\$30,535.97	\$555.20	\$21,492.00	\$390.76
Whispering Ridge 30 connections	\$27,395.30	\$913.18	\$27,442.73	\$914.76

As shown in the table above, which is based upon the data already admitted in the record, the Lakeline Acres, Glenshores, and Airport Addition systems are clearly substantially similar in terms of O&M cost-per-meter. An important point to clarify with the table above is that while Whispering Ridge's O&M cost-per-meter is higher because its test year "Purchases," "Chemicals," "Professional Fees," and "Note Payment," were larger than the others systems, its sales per connection is also generally much higher than the other three systems and such demand warrants the higher costs. As explained in the Expense Sheet, the \$5,692.00 under "Purchases" was for a storage tank which was necessary to meet the Whispering Ridge's higher demand for water. Consequently, in the test year Whispering Ridge had a higher "Professional Fees" and "Note Payment" to reflect the engineering fees for the storage tank and its share of the CCWI's loan attributed to the storage tank. Also, Whispering Ridge's "Chemicals" expenses are typically higher because CCWI requires more chemicals to treat the larger volume of water that Whispering Ridge uses. In light of Whispering Ridge's higher water sales, it is not more burdensome than the other systems and its O&M cost-per-meter should be considered as substantially similar to the other systems.⁷ Since the O&M cost-per-meter for the Systems are substantially similar, the Systems' cost-of-service per connection are also substantially similar.

⁷ *Crystal Clear Water, Inc. Revised Water Rate Increase with Attachments*, Adrian Correspondence (Aug. 19, 2020).

2. Water Conservation Rates

CCWI's proposed tariff for the Systems would promote water conservation for single family residences and landscape irrigation. It is well settled that increasing block rates constitutes a water conservation measure. Here, the tariff proposes an inclining block rate structure of \$3.74 per 1,000 gallons for the first 5,000 gallons; \$5.61 per 1,000 gallons for 5,001 to 10,000 gallons; and \$6.95 per 1,000 gallons for 10,001 gallons and above. The proposed rates are admitted into evidence in this matter in Attachment B to the Joint Motion to Admit Evidence and Remand to the Public Utility Commission, filed on September 3, 2021, and admitted into the record by SOAH Order No. 5 on September 7, 2021. Therefore, evidence already exists in the record to support this finding.

3. Recommended Findings of Fact and Conclusion of Law for Proposed Final Order

Given this evidence already admitted into the record and added through this Response, CCWI recommends that the following Findings of Fact be added to the Proposed Final Order (they could be added after Finding of Fact 12, in the Application Section) to formally support the ordering provision that consolidates the Lakeline Acres, Glenshores, Airport Addition, and Whispering Ridge systems under a single tariff.:

“-The Application, as revised, proposes a consolidated rate for CCWI's four public water systems.

-The four systems are substantially similar and the proposed rates promote water conservation.”

Additionally, the following conclusion of law could be added to the Proposed Final Order:

“- The consolidation of CCWI's rates complies with 16 TAC § 24.25(k).”

B. Notice to OPUC and Motion for Exception

CCWI requests a good cause exception to the 16 TAC § 24.27(d)(1)(A) requirement to send notice of the Application to OPUC. TWC § 13.1871(b) provides that “[a] utility may not make changes in its rates except by sending by mail or e-mail a statement of intent to each ratepayer and to the regulatory authority having original jurisdiction at least 35 days before the effective date of the proposed rate change.” TWC § 13.1871(c) provides that the utility must also “mail, send by e-mail, or deliver a copy of the statement of intent to the appropriate offices of each affected municipality and to any other affected persons as required by the regulatory authority’s rules.” Commission rule 16 TAC § 24.27(d)(1)(A) adds a requirement that the applicant provide a copy of such notice to OPUC; and 16 TAC § 24.2(b) authorizes the Commission to make exceptions to Chapter 24 of the Commission rules for good cause. The Commission has previously granted a good cause exception for notice to OPUC in Docket No. 49892 when OPUC was able to intervene, join the agreement, and did not oppose the applicant’s motion for good cause.⁸

Here, CCWI is a Class D utility and Robert Payne, President of CCWI, filed the Application himself on April 8, 2020. CCWI has not sought a rate change for Lakeline Acres and Glenshores since 1991 and Airport Addition and Whispering Ridge since 2008; and Mr. Payne was not familiar with the notice requirements when he filed the Application. Of CCWI’s 230 connections, 62 individuals intervened in this proceeding, reflecting an approximately 27% participation rate for the Systems’ customers. The intervenors were invited to participate in mediation discussions and later selected representatives to negotiate and execute the Settlement Agreement. These intervenors were able to, and did, consult with Commission Staff throughout the settlement process.

⁸ *Application of Concho Rural Water Corporation for Authority to Change Rates*, Docket No. 49892, Order at 10 (November 18, 2021); Docket No. 49892, Commissioner McAdams’ Memo (Oct. 27, 2021).

CCWI understands that at the Commission's October 28, 2021 Open Meeting, the Commissioners put water and sewer utilities on notice that they must provide notice to OPUC under the Commission's rules. Further, it was emphasized that Class A, B, and C utilities would be under scrutiny as they are more sophisticated and typically represented by experienced counsel, but noted that OPUC typically does not intervene in Class D rate cases. Here, CCWI is a Class D utility that was not represented by counsel when its Application was filed at the Commission.

In the alternative, CCWI has since notified OPUC about this Docket and OPUC has participated in this matter, providing meaningful input. CCWI has provided a copy of the following to OPUC for their review on November 23, 2021: (i) the documents admitted under the Joint Motion filed on September 3, 2021; and (ii) its Response to the October 21, 2021 Commission Counsel Memorandum and Motion to Admit Evidence filed on November 12, 2021. On February 28, 2022, OPUC filed its Unopposed Motion to Intervene, confirming that CCWI reached out to OPUC on November 23, 2021, and emailed OPUC copies of CCWI's application filed on April 8, 2020, and any supplements and amendments to its application, responses to Commission Staff's requests for information, and settlement documents.⁹ CCWI requests that the Commission consider this effort a demonstration of compliance with notice requirements, if the good cause exception is not granted. Additionally, Counsel for CCWI has engaged in discussions with OPUC regarding this matter. In those discussions, counsel for OPUC has requested that CCWI revise the Settlement Agreement regarding attorneys' fees. CCWI, Commission Staff and OPUC, have agreed to this in principle and such changes will be reflected in the revised Settlement Agreement.

⁹ Office of Public Utility Counsel's Unopposed Motion to Intervene (Feb. 28, 2022).

Therefore, CCWI requests that the Commission grant a good cause exception to 16 TAC § 24.27(d)(1)(A), because it is a Class D utility, 62 intervenors participated in the mediation and settlement, and OPUC agreed to the revisions to the Settlement Agreement.

C. Response regarding Affiliates and Motion to Admit

1. There are no affiliates of CCWI.

CCWI does not have any affiliates. The cover page of the Application, already admitted into evidence in this Docket (but attached hereto as Attachment C for the Commission's convenience), states that Mr. Payne owns 100% of CCWI. As additional evidence to further buttress this fact, CCWI submits the Affidavit of Robert Payne, attached hereto as Attachment D, stating that CCWI does not have any affiliates. CCWI requests that such Attachment be admitted into evidence in this Docket.

III. CONCLUSION

For these reasons, CCWI respectfully requests that the Commission accept this Response, admit into evidence in this Docket the Water Systems Facility Information in Attachment A and the Affidavit of Robert Payne in Attachment D; grant CCWI's Motion for Good Cause Exception regarding notice to the Office of Public Utility Counsel; and grant all other and further relief to which it may be entitled.

Respectfully submitted,

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

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

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LEGAL DIVISION**

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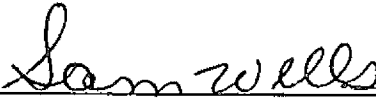
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State Bar No. 06507015

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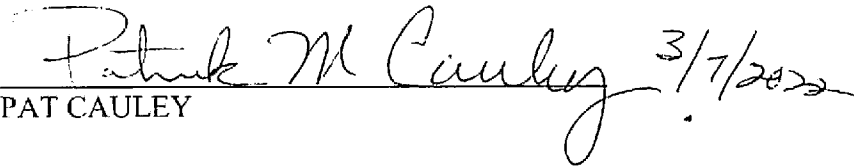
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**REPRESENTATIVE FOR THE
INTERVENORS OF THE AIRPORT WATER
SYSTEM**



SAM WELLS

**REPRESENTATIVE FOR THE
INTERVENORS OF THE GLENSHORES
WATER SYSTEM AND LAKELINE ACRES
WATER SYSTEM**


PAT CAULEY

**REPRESENTATIVE FOR THE
INTERVENORS OF THE WHISPERING
RIDGE WATER SYSTEM**



BRYAN BRONSTAD

CERTIFICATE OF CONFERENCE

I hereby certify that on March 1, 2022, I discussed this Response, Motion to Admit, and Motion for Exception with counsel for OPUC and that OPUC supports Part II.B of this Response regarding notice to OPUC and the Motion for Exception, but neither supports nor opposes the remainder of this filing.

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

DANIELLE LAM

CERTIFICATE OF SERVICE

I hereby certify that a true and correct copy of the foregoing document was transmitted by electronic mail on this 7th day of March, 2022 to the parties of record, in accordance with the Orders Suspending Rules issued in Project No. 50664.

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

DAVID J. KLEIN

ATTACHMENT A

TCEQ Drinking Water Watch Database
Water System Facilities

Texas Commission on Environmental Quality	Office of Water	Public Drinking Water Section
County Map of TX	Water System Search	Office of Compliance and Enforcement

Water System Detail			
Water System Facilities Source Water Assessment Results	Violations Enforcement Actions	TCR Sample Results	TTHM HAA5 Summaries
Sample Points	Assistance Actions	Recent Positive TCR Results	PBCU Summaries
Sample Schedules / EANLs / Plans	Compliance Schedules	Other Chemical Results	Chlorine Summaries
Site Visits Milestones	TOC/Alkalinity Results	Chemical Results: Sort by: Name Code	Turbidity Summaries
Operators All POC	LRAA (TTHM/HAA5)	Recent Non-TCR Sample Results	TCR Sample Summaries
Glossary		DWW Instructions	

Water System Detail Information			
Water System No.:	TX0180025	Federal Type:	C
Water System Name:	LAKELINE ACRES WATER	Federal Source:	GW
Principal County Served:	BOSQUE	System Status:	A
Principal City Served:		Activity Date:	01-01-1913

Water System Facilities					
Facility ID No.	Facility Name	Type	Status/Reason	Availability	Aerial View
DS01	DISTRIBUTION SYSTEM	DS	A	P	
PF7095	CR 1625 - 200 GPM - SP	PF	A	P	
PF7096	CR 1625 - 100 GPM - SP	PF	A	P	
PF7097	CR 1625 - 150 GPM - SP	PF	A	P	
EP001	END CR1625, CLIFTON	SS	A	P	Google Maps
PBCU001	OAK LN; CLIFTON	SS	A	P	
ST7855	CR 1625 - 0.0025 MG - HD	ST	A	P	
ST7856	CR 1625 - 0.024 MG - GR	ST	A	P	
ST7857	CR 1625 - 0.024 MG - GR	ST	A	P	
ST7854	PS - 0.0005 MG - HD	ST	I	O	
TP1059	PLANT - CR 1625	TP	A	P	
G0180025A	1 - CR 1625	WL	A	E	Google Maps SWAP Viewer
G0180025B	2 - CR 1625	WL	A	P	Google

Water System Facility Flows

Supplying Facility ID No.	Supplying Facility Name	Receiving Facility ID No.	Receiving Facility Name
SS - EP001	END CR1625, CLIFTON	DS - DS01	DISTRIBUTION SYSTEM
SS - EP001	END CR1625, CLIFTON	SS - PBCU001	OAK LN; CLIFTON
WL - G0180025A	1 - CR 1625	TP - TP1059	PLANT - CR 1625
WL - G0180025B	2 - CR 1625	TP - TP1059	PLANT - CR 1625
SS - PBCU001	OAK LN; CLIFTON	DS - DS01	DISTRIBUTION SYSTEM
TP - TP1059	PLANT - CR 1625	SS - EP001	END CR1625, CLIFTON

Texas Commission on Environmental Quality	Office of Water	Public Drinking Water Section
County Map of TX	Water System Search	Office of Compliance and Enforcement

Water System Detail			
Water System Facilities Source Water Assessment Results	Violations Enforcement Actions	TCR Sample Results	TTHM HAA5 Summaries
Sample Points	Assistance Actions	Recent Positive TCR Results	PBCU Summaries
Sample Schedules / EANLs / Plans	Compliance Schedules	Other Chemical Results	Chlorine Summaries
Site Visits Milestones	TOC/Alkalinity Results	Chemical Results: Sort by: Name Code	Turbidity Summaries
Operators All POC	LRAA (TTHM/HAA5)	Recent Non-TCR Sample Results	TCR Sample Summaries
Glossary		DWW Instructions	

Water System Detail Information			
Water System No.:	TX0180030	Federal Type:	C
Water System Name:	GLENSHORES WATER	Federal Source:	GW
Principal County Served:	BOSQUE	System Status:	A
Principal City Served:		Activity Date:	01-01-1913

Water System Facilities					
Facility ID No.	Facility Name	Type	Status/Reason	Availability	Aerial View
DS01	DISTRIBUTION SYSTEM	DS	A	P	
EP001	CR 1609 / CR 1623, CLIFTON	SS	A	P	Google Maps
PBCU001	CR 1609 / CR 1623; CLIFTON	SS	A	P	
ST7966	CR 1609 - 0.0002 MG - HD	ST	A	P	
ST7967	CR 1609 - 0.002 MG - HD	ST	A	P	
TP1069	PLANT - CR 1609	TP	A	P	
G0180030A	1 - CR 1609	WL	A	P	Google Maps SWAP Viewer

Water System Facility Flows			
Supplying Facility ID No.	Supplying Facility Name	Receiving Facility ID No.	Receiving Facility Name
SS - EP001	CR 1609 / CR 1623, CLIFTON	DS - DS01	DISTRIBUTION SYSTEM

SS - EP001	CR 1609 / CR 1623, CLIFTON	SS - PBCU001	CR 1609 / CR 1623; CLIFTON
WL - G0180030A	1 - CR 1609	TP - TP1069	PLANT - CR 1609
SS - PBCU001	CR 1609 / CR 1623; CLIFTON	DS - DS01	DISTRIBUTION SYSTEM
TP - TP1069	PLANT - CR 1609	SS - EP001	CR 1609 / CR 1623, CLIFTON

Texas Commission on Environmental Quality	Office of Water	Public Drinking Water Section
County Map of TX	Water System Search	Office of Compliance and Enforcement

Water System Detail			
Water System Facilities Source Water Assessment Results	Violations Enforcement Actions	TCR Sample Results	TTHM HAA5 Summaries
Sample Points	Assistance Actions	Recent Positive TCR Results	PBCU Summaries
Sample Schedules / EANLs / Plans	Compliance Schedules	Other Chemical Results	Chlorine Summaries
Site Visits Milestones	TOC/Alkalinity Results	Chemical Results: Sort by: Name Code	Turbidity Summaries
Operators All POC	LRAA (TTHM/HAA5)	Recent Non-TCR Sample Results	TCR Sample Summaries
Glossary		DWW Instructions	

Water System Detail Information			
Water System No.:	TX0180032	Federal Type:	C
Water System Name:	CRYSTAL CLEAR WATER AIRPORT	Federal Source:	GW
Principal County Served:	BOSQUE	System Status:	A
Principal City Served:		Activity Date:	01-01-1913

Water System Facilities					
Facility ID No.	Facility Name	Type	Status/Reason	Availability	Aerial View
DS01	DISTRIBUTION SYSTEM	DS	A	P	
PF15423	MAIN PLANT - 100 GPM - SP	PF	A	P	
PF15424	MAIN PLANT - 100 GPM - SP	PF	A	P	
EP001	CR 3260 / HILLCREST RD, CLIFTON	SS	A	P	Google Maps
PBCU001	CR 3260 / HILLCREST RD; CLIFTON	SS	A	P	
ST18016	MAIN PLANT - 0.0015 MG - HD	ST	A	P	
ST18017	MAIN PLANT - 0.001 MG - HD	ST	A	P	
ST18018	MAIN PLANT - 0.02 MG - GR	ST	A	P	
TP1071	PLANT - CR 3260 / HILLCREST	TP	A	P	
G0180032A	1 - FM 3221 (0.5 MI FROM JCT FM 1991)	WL	A	P	Google Maps SWAP Viewer

Water System Facility Flows			
Supplying Facility ID No.	Supplying Facility Name	Receiving Facility ID No.	Receiving Facility Name
SS - EP001	CR 3260 / HILLCREST RD, CLIFTON	DS - DS01	DISTRIBUTION SYSTEM
SS - EP001	CR 3260 / HILLCREST RD, CLIFTON	SS - PBCU001	CR 3260 / HILLCREST RD; CLIFTON
WL - G0180032A	1 - FM 3221 (0.5 MI FROM JCT FM 1991)	TP - TP1071	PLANT - CR 3260 / HILLCREST
SS - PBCU001	CR 3260 / HILLCREST RD; CLIFTON	DS - DS01	DISTRIBUTION SYSTEM
TP - TP1071	PLANT - CR 3260 / HILLCREST	SS - EP001	CR 3260 / HILLCREST RD, CLIFTON

Texas Commission on Environmental Quality	Office of Water	Public Drinking Water Section
County Map of TX	Water System Search	Office of Compliance and Enforcement

Water System Detail			
Water System Facilities Source Water Assessment Results	Violations Enforcement Actions	TCR Sample Results	TTHM HAA5 Summaries
Sample Points	Assistance Actions	Recent Positive TCR Results	PBCU Summaries
Sample Schedules / EANLs / Plans	Compliance Schedules	Other Chemical Results	Chlorine Summaries
Site Visits Milestones	TOC/Alkalinity Results	Chemical Results: Sort by: Name Code	Turbidity Summaries
Operators All POC	LRAA (TTHM/HAA5)	Recent Non-TCR Sample Results	TCR Sample Summaries
Glossary		DWW Instructions	

Water System Detail Information			
Water System No.:	TX0180081	Federal Type:	C
Water System Name:	CRYSTAL CLEAR WHISPERING RIDGE	Federal Source:	GW
Principal County Served:	BOSQUE	System Status:	A
Principal City Served:		Activity Date:	07-11-2002

Water System Facilities					
Facility ID No.	Facility Name	Type	Status/Reason	Availability	Aerial View
DS01	DISTRIBUTION SYSTEM	DS	A	P	
PF15492	MAIN PLANT - 100 GPM - SP	PF	A	P	
PF15493	MAIN PLANT - 100 GPM - SP	PF	A	P	
EP001	255 PRIVATE RD 4297 OFF CR 4290, CLIFTON	SS	A	P	Google Maps
PBCU001	255 PRIVATE RD 4297 OFF CR 4290; CLIFTON	SS	A	P	
ST18108	MAIN PLANT - 0.001 MG - HD	ST	A	P	
ST18109	MAIN PLANT - 0.009 MG - GR	ST	A	P	
ST1811	MAIN PLANT - 0.01 MG - GR	ST	A	P	
TP19201	PLANT - PRIVATE RD 4297	TP	A	P	
G0180081A	1	WL	A	P	Google Maps SWAP Viewer

Water System Facility Flows			
Supplying Facility ID No.	Supplying Facility Name	Receiving Facility ID No.	Receiving Facility Name
SS - EP001	255 PRIVATE RD 4297 OFF CR 4290, CLIFTON	DS - DS01	DISTRIBUTION SYSTEM
SS - EP001	255 PRIVATE RD 4297 OFF CR 4290, CLIFTON	SS - PBCU001	255 PRIVATE RD 4297 OFF CR 4290; CLIFTON
WL - G0180081A	1	TP - TP19201	PLANT - PRIVATE RD 4297
SS - PBCU001	255 PRIVATE RD 4297 OFF CR 4290; CLIFTON	DS - DS01	DISTRIBUTION SYSTEM
TP - TP19201	PLANT - PRIVATE RD 4297	SS - EP001	255 PRIVATE RD 4297 OFF CR 4290, CLIFTON

ATTACHMENT B

Expense Sheet

Adrian,

The meter break down for Crystal Clear Water Inc. are as follows: Lake Line 120, Glen Shores 26, Airport 55, and Whispering Ridge 30.

Attached is the expense report for each of the public water supplies. However, please note the following additions or corrections to the report.

1. The property taxes listed in the report shows a total of \$3385.19. I was not able to pay the rest of Lake Line's taxes until 2020. That amount was \$ 3890.00 for Lake Line.
2. I divided the note payment as fairly as possible between the systems. I was only able to make a total payment of \$ 15,000.00 when to note requirement was \$44,747.55.
3. You will notice that a purchase was made for a water storage tank for Whispering Ridge in the amount of \$5692.00. This is NOT a true account because I had to personally loan to Crystal Clear Water \$ 10,000.00 (as reflected in the note). I personally paid and additional \$4308.00 from my own personal account for a total of \$22,407.00 (the engineer's cost of \$ 2407.00 is listed under professional).
4. I divided the office secretary proportionally by the number of meters at each system.
5. This report does NOT account for myself being the operator for Whispering Ridge and Airport for no pay.
6. This report does NOT account for myself being the Administrator for all systems for no pay.
7. This report does NOT account for me using my personal pick up truck for all operations of the systems.
8. This report does NOT account for me providing and paying for office space, utilities for the office and phone and internet services for Crystal Clear Water.

Hopefully this will help to propel the application process. As you know, I have been working on this application for a long time with extensions being required because of correspondence taking too long. Please get back to me as soon as possible.

Sincerely,

Robert Payne

Crystal Clear Water Inc. Profit & Loss by Class

Accrual Basis

January through December 2019

	Airport Addition	Glenn Shores Water	Lake Line Water	Whispering Ridge	Unclassified	TOTAL
Ordinary Income/Expense						
Income						
EQUIPMENT RENTAL INCOME	0.00	0.00	700.00	0.00	0.00	700.00
Fees	505.00	195.00	1,815.00	270.00	0.00	2,785.00
Sales	30,535.97	8,869.10	30,309.41	27,395.30	0.00	97,109.78
Services	0.00	0.00	700.00	0.00	0.00	700.00
Total Income	31,040.97	9,064.10	33,524.41	27,665.30	0.00	101,294.78
Gross Profit	31,040.97	9,064.10	33,524.41	27,665.30	0.00	101,294.78
Expense						
Bank Service Charges	0.00	0.00	0.00	0.00	1.45	1.45
Chemicals	798.62	83.93	286.29	1,543.14	0.00	2,711.98
Contract Labor						
Meter Reading	0.00	0.00	234.00	0.00	0.00	234.00
Contract Labor - Other	6,875.00	4,204.60	22,479.00	4,005.00	0.00	37,563.60
Total Contract Labor	6,875.00	4,204.60	22,713.00	4,005.00	0.00	37,797.60
Licenses and Permits	111.00	0.00	0.00	0.00	0.00	111.00
NOTE PAYMENT	5,000.00	1,000.00	3,000.00	6,000.00	0.00	15,000.00
Office Supplies	364.00	241.62	708.41	258.80	0.00	1,572.83
Postage and Delivery	336.63	130.57	512.64	345.24	0.00	1,325.08
Professional Fees	100.00	1,084.00	125.00	2,407.00	0.00	3,716.00
PURCHASES	0.00	0.00	0.00	5,692.00	0.00	5,692.00
Reconciliation Discrepancies	0.00	0.00	0.00	0.00	19.09	19.09
Regulatory Expense						
TECQ Fees	0.00	221.30	874.20	0.00	0.00	1,095.50
Water Samples	616.85	1,376.85	1,026.02	409.85	0.00	3,429.57
Total Regulatory Expense	616.85	1,598.15	1,900.22	409.85	0.00	4,525.07
Repairs						
Building Repairs	0.00	0.00	70.00	0.00	0.00	70.00
Equipment and Leak Repairs	886.35	0.00	3,191.42	2,376.72	0.00	6,454.49
Total Repairs	886.35	0.00	3,261.42	2,376.72	0.00	6,524.49
Taxes						
Property	1,029.11	645.26	825.73	297.96	587.13	3,385.19
Total Taxes	1,029.11	645.26	825.73	297.96	587.13	3,385.19
Travel & Ent						
Entertainment	0.00	0.00	20.31	0.00	0.00	20.31
Travel	0.00	0.00	0.00	273.52	0.00	273.52
Travel & Ent - Other	200.11	0.00	41.41	0.00	0.00	241.52
Total Travel & Ent	200.11	0.00	61.72	273.52	0.00	535.35
Utilities						
Gas and Electric	5,174.33	899.40	4,968.99	3,833.50	0.00	14,876.22
Total Utilities	5,174.33	899.40	4,968.99	3,833.50	0.00	14,876.22
Total Expense	21,492.00	9,887.53	38,363.42	27,442.73	607.67	97,793.35
Net Ordinary Income	9,548.97	-823.43	-4,839.01	222.57	-607.67	3,501.43
Net Income	9,548.97	-823.43	-4,839.01	222.57	-607.67	3,501.43

ATTACHMENT C

Application Cover Page



CLASS C RATE/TARIFF CHANGE APPLICATION

UTILITY NAME: CRYSTAL CLEAR WATER, INC

CCN No. 12997

ADDRESS OF UTILITY: 122 S AVENUE D
P.O. Box, Street and suite number, if applicable

CLIFTON TX 76634 - 2229
City and Zip Code

PHONE NUMBER: (254) 749-0942
area code

NAME OF PERSON TO CONTACT REGARDING THIS FILING:

NAME: Robert Payne

PHONE: 254-675-3551

EMAIL ADDRESS: Robert Payne (rpayneag@gmail.com)

PUCT CLASS SIZE: ☐ C ☒ D (Mark One Box)
Connection Count: 500-2299 0-499

FOR TEST YEAR ENDING: December 31, 2019 (Enter Month/ Date/Year)

AMOUNT INCREASE (DECREASE): \$120,294.06
in dollars
(From Schedule VII-1, Column B, Line 5 or
Schedule VII-2, Column C, Line 29 or
Schedule VII-3, Column C, Line 51)

PERCENT INCREASE (DECREASE): 69%
percent above (below) current revenue requirement
(From Schedule VII-1, Column B, Line 6 or
Schedule VII-2, Column C, Line 30 or
Schedule VII-3, Column C, Line 52)

DESCRIBE OWNERSHIP OF COMPANY:
100% OWNED BY ROBERT PAYNE

PUBLIC UTILITY COMMISSION OF TEXAS (PUCT) DOCKET NUMBER OF LAST MAJOR RATE F TCEQ
(If the last major rate filing was at the Texas Commission on Environmental Quality (TCEQ), provide a copy of the final order.)

RATE CASE OR DOCKET NUMBER OF LAST MINOR TARIFF RATE CHANGE**: 35992-G

IF ANY UTILITY ASSETS WERE TRANSFERRED IN A SALE, TRANSFER, MERGER
APPLICATION (STM), PROVIDE THE DOCKET NO.(S) OR TCEQ APPLICATION NUMBER(S): NA

*(e.g. Class B, C or D Rate Change application or TCEQ Rate/Tariff change application).

** (e.g. pass-through rate change or temporary water rate provision).

ATTACHMENT D

Affidavit of Robert Payne

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

APPLICATION OF CRYSTAL CLEAR
WATER, INC. FOR AUTHORITY TO
CHANGE RATES

§
§
§

PUBLIC UTILITY COMMISSION
OF TEXAS

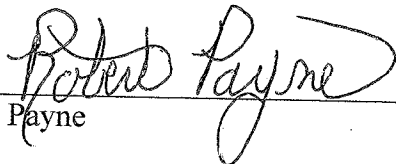
AFFIDAVIT OF ROBERT PAYNE

On this day, appeared before me, the undersigned notary public, Robert Payne, president of Crystal Clear Water, Inc. ("CCWI"), a Texas for-profit corporation, and after I administered an oath to him, upon his oath, he said:

"My name is Robert Payne. I am the president of CCWI. I am more than twenty-one (21) years of age and capable of making this affidavit. I have personal knowledge of the facts stated herein, which are true and correct.

CCWI does not have any 'affiliates,' as such term is defined in the Chapter 24 rules of the Public Utility Commission. Therefore, there were no costs to affiliates considered in CCWI's rate application filed under Public Utility Commission Docket No. 50721."

FURTHER AFFIANT SAYETH NOT.


Robert Payne

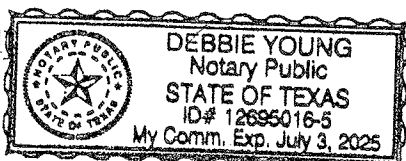
STATE OF TEXAS

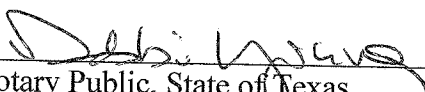
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COUNTY OF Bosque

Sworn to and subscribed before me the undersigned authority on the 7 day of Dec, 2021.

[Seal]




Notary Public, State of Texas