



Control Number: 50789



Item Number: 22

Addendum StartPage: 0

DOCKET NO. 50789

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APPLICATION OF THE CITY OF §
RICHLAND FOR A WATER §
CERTIFICATE OF CONVENIENCE §
AND NECESSITY AND FOR DUAL §
CERTIFICATION WITH CORBET §
WATER SUPPLY CORPORATION AND §
PLEASANT GROVE WATER SUPPLY §
CORPORATION IN NAVARRO §
COUNTY §

PUBLIC UTILITY COMMISSION
OF TEXAS

**COMMISSION STAFF'S SECOND REQUEST FOR INFORMATION
TO THE CITY OF RICHLAND
QUESTION NOS. STAFF 2-1 THROUGH STAFF 2-5**

COMES NOW the Staff (Staff) of the Public Utility Commission of Texas (Commission), representing the public interest, and files this Commission Staff's Second Request for Information to the City of Richland Question Nos. Staff 2-1 Through 2-5.

The Staff of the Public Utility Commission of Texas (Staff) requests that the City of Richland (Richland) 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 20 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, Richland must submit an amended answer, under oath, as a supplement to its 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 that answer.

Dated: September 22, 2020

Respectfully submitted,

**PUBLIC UTILITY COMMISSION OF TEXAS
LEGAL DIVISION**

Rachelle Nicolette Robles
Division Director

Eleanor D'Ambrosio
Managing Attorney

/s/ Merritt Lander
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DOCKET NO. 50789

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 on September 22, 2020 in accordance with the Order Suspending Rules issued in Project No. 50664.

/s/ Merritt Lander
Merritt Lander

DOCKET NO. 50789

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DEFINITIONS

- 1) "Richland" or "you" refers to the City of Richland 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 Richland'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.

DOCKET NO. 50789

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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.

DOCKET NO. 50789

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QUESTION NOS. STAFF 2-1 THROUGH STAFF 2-5**

Please provide a copy of each map that Richland uses to respond to the questions below (if applicable) in an Adobe PDF file format. Electronically file a copy of each map on the Commission Interchange Filer and email them to CentralRecords@puc.texas.gov.

- Staff 2-1** Please provide a map that shows the location of the customers receiving service, identified by parcel, in the requested areas. Please include the current and proposed CCN boundaries and exclude roads that cut through the parcels.
- Staff 2-2** Please provide the total acreage covered by the parcels on which the current customer connections in the requested areas are located.
- Staff 2-3** Please provide the total acreage of the parcels for which landowners have requested service in the requested areas.
- Staff 2-4** Please provide the total acreage in the requested areas where there are no requests for service and no current customers.
- Staff 2-5** Please provide a map showing the boundaries of the requested CCN area and the city limit and ETJ boundaries.