



Control Number: 50789



Item Number: 26

Addendum StartPage: 0



DOCKET NO. 50789

**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**

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**PUBLIC UTILITY COMMISSION
OF TEXAS**

**COMMISSION STAFF'S THIRD REQUEST FOR INFORMATION
TO THE CITY OF RICHLAND
QUESTION NOS. STAFF 3-1 THROUGH STAFF 3-3**

COMES NOW the Staff (Staff) of the Public Utility Commission of Texas (Commission), representing the public interest, and files this Commission Staff's Third Request for Information to the City of Richland Question Nos. Staff 3-1 Through 3-3.

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 25, 2020

Respectfully submitted,

**PUBLIC UTILITY COMMISSION OF TEXAS
LEGAL DIVISION**

Rachelle Nicolette Robles
Division Director

Eleanor D'Ambrosio
Managing Attorney

/s/ Merritt Lander
Merritt Lander
State Bar No. 24106183
1701 N. Congress Avenue
P.O. Box 13326
Austin, Texas 78711-3326
(512) 936-7290
(512) 936-7268 (facsimile)
Merritt.Lander@puc.texas.gov

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 25, 2020 in accordance with the Order Suspending Rules issued in Project No. 50664.

/s/ Merritt Lander
Merritt Lander

DOCKET NO. 50789

**COMMISSION STAFF'S THIRD REQUEST FOR INFORMATION
TO THE CITY OF RICHLAND
QUESTION NOS. STAFF 3-1 THROUGH STAFF 3-3**

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

**COMMISSION STAFF'S THIRD REQUEST FOR INFORMATION
TO THE CITY OF RICHLAND**

QUESTION NOS. STAFF 3-1 THROUGH STAFF 3-3

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

**COMMISSION STAFF'S THIRD REQUEST FOR INFORMATION
TO THE CITY OF RICHLAND
QUESTION NOS. STAFF 3-1 THROUGH STAFF 3-3**

- Staff 3-1** Reference the response to Staff 2-2. Of the 2,280 acres with current customer connections, please indicate the total acreages for the following:
- a. Acreage inside the city limits;
 - b. Acreage inside the extraterritorial jurisdiction (ETJ); and
 - c. Acreage outside the city limits and ETJ.
- Staff 3-2** Reference the response to Staff 2-3. Of the 328 acres for which landowners are requesting service, please indicate the total acreages for the following:
- a. Acreage inside city limits;
 - b. Acreage inside ETJ; and
 - c. Acreage outside the city limits and ETJ
- Staff 3-3** Reference the response to Staff 2-4. Of the 6,118 acres for which there are no current customers and no landowners are requesting service, please indicate the total acreages for the following:
- a. Acreage inside city limits;
 - b. Acreage inside ETJ; and
 - c. Acreage outside the city limits and ETJ.