

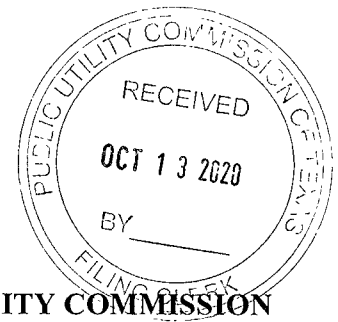


Control Number: 50789



Item Number: 28

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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 FOURTH REQUEST FOR INFORMATION
TO THE CITY OF RICHLAND
QUESTION NOS. STAFF 4-1 THROUGH STAFF 4-6**

COMES NOW the Staff (Staff) of the Public Utility Commission of Texas (Commission), representing the public interest, and files this Commission Staff's Fourth Request for Information to the City of Richland Question Nos. Staff 4-1 Through 4-6.

Staff requests that the City of Richland (Richland) provide the following information and answer the following questions under oath. The questions 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 questions 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.

Provide responses to the Requests for Information by filing with the Commission solely through the Interchange on the Commission's website and provide notice, by email, to all other parties that the pleading or document has been filed with the Commission, unless otherwise ordered by the presiding officer pursuant to the Order Suspending Rules in Docket No. 50664.

Dated: October 13, 2020

Respectfully submitted,

**PUBLIC UTILITY COMMISSION OF TEXAS
LEGAL DIVISION**

Rachelle Nicolette Robles
Division Director

Eleanor D'Ambrosio
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/s/ Merritt Lander
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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 on October 13, 2020 in accordance with the Order Suspending Rules issued in Project No. 50664.

/s/ Merritt Lander
Merritt Lander

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**COMMISSION STAFF'S FOURTH REQUEST FOR INFORMATION
TO THE CITY OF RICHLAND
QUESTION NOS. STAFF 4-1 THROUGH STAFF 4-6**

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.

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**COMMISSION STAFF'S FOURTH REQUEST FOR INFORMATION
TO THE CITY OF RICHLAND
QUESTION NOS. STAFF 4-1 THROUGH STAFF 4-6**

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.

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TO THE CITY OF RICHLAND
QUESTION NOS. STAFF 4-1 THROUGH STAFF 4-6**

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 4-1** Please provide a detailed map identifying the existing facility lines and customers, by parcel, within the requested area in reference to verifiable man-made and natural landmarks such as roads, rivers, and railroads. Please include the following in the requested map: the requested certificate of convenience and necessity (CCN) area, parcel lines, and parcel number/labels. Please color code the parcels using the categories listed below (provide multiple maps, by section, if necessary, for details to be visible):
1. Please assign a single color to all parcels belonging to current customers.
 2. Please assign a single color to parcels through which or by which existing facilities pass.
 3. Please assign a single color to parcels with requests for service.
 4. Please assign a single color to parcels lying between two parcels that fall under either item 1, 2, or 3 above.
 5. Please provide a table corresponding to the map with the following information for each parcel:

Parcel Number/Label	Acreage	Current Customer (Y/N)	Existing Facilities (Y/N)	Request for Service (Y/N)	Intermediate Parcel (Y/N)	Outside City Limits (Y/N)	Outside ETJ (Y/N)
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- Staff 4-2** For any parcel in the requested area that does not contain current customers or existing facilities, does not have a pending request for service, and is not located in between parcels that contain current customers or existing facilities or have a pending request for service, please provide a written explanation supporting the need for service in those parcels.

- Staff 4-3** Please provide a written narrative supporting the need for service for the entire requested area as shown on the detailed map and table.

- Staff 4-4** Please provide the total acreage for each of the categories requested above. For those parcels that are partially in the CCN, include only the acreage in the current requested area.

Staff 4-5 Please provide the total acreage in the requested area where there are no requests for service and no current customers.

Staff 4-6 Please provide a map showing the boundaries of the requested CCN area and the city limit and extra-territorial jurisdiction (ETJ) boundaries.