



Control Number: 50861



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DOCKET NO. 50861

APPLICATION OF MANVILLE
WATER SUPPLY CORPORATION TO
AMEND ITS CERTIFICATE OF
CONVENIENCE AND NECESSITY IN
LEE AND WILLIAMSON COUNTIES

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**COMMISSION STAFF'S SECOND REQUEST FOR INFORMATION
TO MANVILLE WATER SUPPLY CORPORATION
QUESTION NOS. STAFF 2-1 THROUGH 2-5**

Under 16 Texas Administrative Code (TAC) § 22.144 of the Commission's Procedural Rules, the Staff of the Public Utility Commission of Texas (Staff) requests that Manville Water Supply Corporation, through its attorneys of record, 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, submit an amended answer, under oath, as a supplement to your 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 the 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: February 4, 2021

Respectfully submitted,

**PUBLIC UTILITY COMMISSION OF TEXAS
LEGAL DIVISION**

Rachelle Nicolette Robles
Division Director

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Managing Attorney

/s/ Daniel Moore

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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 February 4, 2021, in accordance with the Order Suspending Rules, issued in Project No. 50664.

/s/ Daniel Moore

Daniel Moore

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**COMMISSION STAFF'S SECOND REQUEST FOR INFORMATION
TO MANVILLE WATER SUPPLY CORPORATION
QUESTION NOS. STAFF 2-1 THROUGH 2-5**

DEFINITIONS

- 1) "Manville WSC," or "you" refers to Manville Water Supply Corporation 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 Company'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.
- 3) "Revised Requested Area" refers to the area requested by Manville WSC on November 13, 2020, which Staff deemed sufficient on January 25, 2021.

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TO MANVILLE WATER SUPPLY CORPORATION
QUESTION NOS. STAFF 2-1 THROUGH 2-5**

INSTRUCTIONS

- 1) Under 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) Under 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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**COMMISSION STAFF'S SECOND REQUEST FOR INFORMATION
TO MANVILLE WATER SUPPLY CORPORATION
QUESTION NOS. STAFF 2-1 THROUGH 2-5**

Staff 2-1 Please provide a detailed map identifying the existing facility lines and current customers within the revised requested area in reference to parcels, verifiable man-made and natural landmarks such as roads, rivers, and railroads. Please include the following items in the requested map: the revised requested area and parcel lines. Please color code the parcels using the categories listed below (if necessary, provide multiple maps by section, for details to be visible):

- 1) Parcels belonging to current customers,
- 2) Parcels with requests for service,
- 3) Parcels where existing facilities pass through or by the parcel,
- 4) Parcels that are already partly within the existing boundaries of CCN No. 11144, and
- 5) Parcels that are located between parcels that fall under items 1, 2, 3, or 4.
- 6) Please provide an Excel table corresponding to the map with the following information for each parcel:

Parcel Number/Label	1) Current Customer (Y/N)	2) Request for Service (Y/N)	3) Existing Facilities (Y/N)	4) Portion inside current CCN (Y/N)	5) Intermediate Parcel (Y/N)

Staff 2-2 Please provide a written explanation supporting the need for service for each parcel in the revised requested area (1) that does not contain current customers or existing facilities; (2) does not have a pending request for service; or (3) is only included on the map because it is located between parcels that contain current customers, existing facilities, or a pending request for service.

Staff 2-3 Please provide a written narrative supporting the need for service for the entire revised requested area as shown on the detailed map and table provided in response to Staff RFI 2-1.

Staff 2-4 For each category listed in Staff RFI 2-1, please provide the total acreage of all parcels within the category. For those parcels that are already partially within the existing CCN, only include the acreage that is in the revised requested area.

Staff 2-5 Please provide the number of current customer connections and the number of requests for service in the revised requested area.

Please provide a copy of each map that the Applicant uses to respond to the items requested above in an Adobe PDF file format. Electronically file a copy of each map to the Commission Interchange Filer and email to CentralRecords@puc.texas.gov.