



Control Number: 51044



Item Number: 53

Addendum StartPage: 0

PUC DOCKET NO. 51044

**PETITION OF FCS LANCASTER, LTD
TO AMEND ROCKETT SPECIAL
UTILITY DISTRICT'S CERTIFICATE
OF CONVENIENCE & NECESSITY IN
DALLAS COUNTY BY EXPEDITED
RELEASE**

§
§
§
§
§
§

RECEIVED
2021 MAR -8 AM 10:56
BEFORE THE
PUBLIC UTILITY COMMISSION
FILING CLERK
PUBLIC UTILITY COMMISSION
OF TEXAS

**FCS LANCASTER, LTD'S FIRST REQUEST FOR INFORMATION
TO ROCKETT SPECIAL UTILITY DISTRICT**

FCS Lancaster, Ltd (FCS Lancaster) files this First Request for Information (RFI) to Rockett Special Utility District (Rockett) in the above-styled docket. Rockett is hereby requested to furnish one copy of all items of information enumerated on the attached sheets directly to the undersigned attorney at the offices of Lloyd Gosselink Rochelle & Townsend, P.C., 816 Congress Avenue, Suite 1900, Austin, Texas 78701 within twenty (20) calendar days. These requests shall be deemed continuing so as to require further and supplemental responses if Rockett receives or generates additional information within the scope of these requests between the time of the original response and the time of the hearing. Also, where data is requested, provide it in hard copy and Excel format with all formulas intact.

DEFINITIONS AND INSTRUCTIONS

A. "Rockett" refers to the Rockett Special Utility District, its parents, affiliates and subsidiaries, and any person acting or purporting to act on its behalf, including without limitation, attorneys, agents, advisors, investigators, representatives, employees or other persons.

B. The term "document" shall have the broadest meaning possible under the Texas Rules of Civil Procedure and shall include, but not be limited to, the original (or a copy when the original is not available), each non-identical copy (including those which are non-identical by reason of notations or marking, or by appearing in the files of a separate person), and any books, notebooks, pamphlets, periodicals, letters, reports, memoranda, handwritten notes, notations, messages, telegrams, wires, cables, press or news wire releases, records, studies, analyses, summaries, magazines, booklets, circulars, catalogs, bulletins, instructions, operating or maintenance manuals, operating or product specifications, fabrication sheets, test data, design specifications, parts lists, calendars, day-timers, notes or records of meetings, notices, purchase orders, bills, ledgers, checks, tabulations, questionnaires, surveys, drawings, sketches, schematics, blueprints, flow sheets, working papers, charts, graphs, indices, tapes, agreements, releases, appraisals, valuations, estimates, opinions, financial statements, accounting records, income statements, photographs, films or videotapes, back-up tapes, minutes, contracts, leases, invoices,

records of purchase or sale, correspondence, electronic or other transcription or tapings of or notes pertaining to telephone or personal conversations or conferences, tape recordings, electromagnetic recordings, voice mail message or transcriptions thereof, interoffice communications of all types, e-mail messages, printouts of e-mail messages, instant messages or printouts thereof, microfilms, electronic databases, CDs, DVDs, videotapes or cassettes, films, movies, computer printouts and any and all other written, printed, typed, punched, engraved, taped, filmed, recorded (electronically or otherwise), labeled, or graphic matter, of whatever description, however produced or reproduced (including computer-stored or generated data, together with instructions or programs necessary to search and retrieve such data), and shall include all attachments to (including tangible things) and enclosures with (including tangible things) any requested item, to which they are attached or with which they are enclosed, and each draft thereof. A draft of a non-identical copy is a separate document within the meaning of this term. An electronic copy of a paper document is a separate document within the meaning of this term.

C. Pursuant to Tex. R. Civ. P. 196.4, FCS Lancaster specifically requests that any electronic or magnetic data (which is included in the definition of “document”) that is responsive to a request herein be produced on CD-Rom in a format that is compatible with Microsoft Office and/or Word Perfect and be produced with your response to these requests. FCS Lancaster further requests that Rockett produce electronic copies of all paper documents, including any metadata attached to such documents, and produce all electronic originals or all responsive documents.

D. The terms “and” and “or” shall be construed both disjunctively and conjunctively as necessary to make the request inclusive rather than exclusive.

E. “Each” shall be construed to include the word “every” and “every” shall be construed to include the word “each.”

F. “Any” shall be construed to include “all” and “all” shall be construed to include “any.”

G. The term “concerning,” or one of its inflections, includes the following meanings: relating to; referring to; pertaining to; regarding; discussing; mentioning; containing; reflecting; evidencing; describing; showing; identifying; providing; disproving; consisting of; supporting; contradicting; in any way legally, logically or factually connected with the matter to which the term refers; or having a tendency to prove or disprove the matter to which the term refers.

H. The term “including,” or one of its inflections, means and refers to “including but not limited to.”

I. 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.

J. The present tense shall be construed to include the past tense, and the past tense shall be construed to include the present tense.

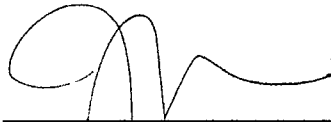
K. If any document is withheld under any claim of privilege, please furnish a list identifying each document for which a privilege is claimed, together with the following

information: date, sender, recipients or copies, subject matter of the document, and the basis upon which such privilege is claimed.

L. Pursuant to 16 Tex. Admin Code § 22.144(h)(4), if the response to any request is voluminous, please provide a detailed index of the voluminous material.

M. If the information requested is included in previously furnished exhibits, workpapers, responses to other discovery inquiries or otherwise, in hard copy or electronic format, please furnish specific references thereto, including Bates Stamp page citations and detailed cross references.

Respectfully submitted,



Jamie L. Mauldin
Texas State Bar No. 24065694
jmauldin@lglawfirm.com

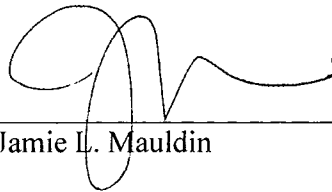
James F. Parker
Texas State Bar No. 24027591
jparker@lglawfirm.com

LLOYD GOSSELINK ROCHELLE & TOWNSEND, PC
816 Congress Ave., Suite 1900
Austin, Texas 78701
Telephone: 512-322-5800
Telecopier: 512-472-0532

ATTORNEYS FOR FCS LANCASTER, LTD

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 March 8, 2021, in accordance with the Order Suspending Rules, issued in Project No. 50664.



Jamie L. Mauldin

PUC DOCKET NO. 51044

FCS LANCASTER'S FIRST RFI TO ROCKETT

- FCSL 1-1 Please provide a current map of the existing Rockett facilities that includes a map of the existing water distribution system.
- FCSL 1-2 Please provide a current map of the existing Rockett facilities that includes location, size, and types of all storage facilities on Rockett's system.
- FCSL 1-3 What type of storage does Rockett use?
- FCSL 1-4 Does Rockett conform with TCEQ storage requirements?
- FCSL 1-5 Please provide the number of connections within Rockett's system.
- FCSL 1-6 Please provide copies of Rockett's audited financial statements, CAFRs, and/or Annual Financial Statements for the previous five (5) years.
- FCSL 1-7 Please provide a copy of the detailed revenue and expense budget for Rockett for the current fiscal year.
- FCSL 1-8 Please provide the current 10-Year Capital Improvement Plan for Rockett. This CIP should include a detailed description of each of the projects identified in the plan including if it is for repairs and maintenance, growth related, etc.
- FCSL 1-9 Please provide a detailed listing and valuation of all Rockett's assets developed and currently existing for the express purpose of providing service to the recently decertified CCN areas.
- FCSL 1-10 Please provide a comprehensive current asset listing for Rockett including description, original cost and year in service. For treatment plant assets, please identify current treatment capacities for each asset/plant.
- FCSL 1-11 Please provide information on any outstanding debt obligations of Rockett including debt service schedules and detailed descriptions of the uses of the funds for each debt issue (i.e. asset maintenance, construction, design, etc.).
- FCSL 1-12 Based on the 2019 Annual Drinking Water Quality Report, Rockett purchases Surface Water from the Robert W. Sokol WTP (Cedar Creek and Richland Chambers Reservoirs); the City of Midlothian (Joe Pool, Richland Chambers Reservoir, and Cedar Creek); and the City of Waxahachie (Lake Waxahachie and Lake Bardwell). Please provide copies of all of these water purchase agreements as well as historic purchases/production by month from January 2016 to the present.
- FCSL 1-13 Does Rockett have any other agreements to purchase water from any other entity? If so, please provide all supporting contracts and other relevant documentation regarding these purchases, and please provide monthly purchases from each of these sources by month from January 2016 to the present.

PUC DOCKET NO. 51044

FCS LANCASTER'S FIRST RFI TO ROCKETT

- FCSL 1-14 Please provide any planning documents developed for Rockett over the past five years. This would include any master plans, growth plans, development plans, etc.
- FCSL 1-15 Please provide current projections of future growth for Rockett including both customer account projections and demand needs. Please provide projections for a minimum of 5 years.
- FCSL 1-16 Please provide water billed revenues by identified customer class by month from January 2016 to the present.
- FCSL 1-17 Please provide water consumption by identified customer class by month from January 2016 to the present.
- FCSL 1-18 Please provide water active accounts by identified customer class by month from January 2016 to the present.
- FCSL 1-19 Please provide a copy of Rockett's current water rate schedule, and a schedule of all non-rate fees.
- FCSL 1-20 Does Rockett SUD have any other contractual agreements/obligations relative to the provision of water service? If yes, please provide copies of those agreements as well as the current status of the agreements.