



Control Number: 51065



Item Number: 12

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DOCKET NO. 51065

**APPLICATION OF TREETOP
UTILITIES, INC. AND CSWR-TEXAS
UTILITY OPERATING COMPANY,
LLC FOR SALE, TRANSFER, OR
MERGER OF FACILITIES AND
CERTIFICATE RIGHTS IN PARKER
COUNTY** §
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**PUBLIC UTILITY COMMISSION
OF TEXAS**

**COMMISSION STAFF'S FIRST REQUEST FOR INFORMATION
TO CSWR TEXAS UTILITY OPERATING COMPANY, LLC
QUESTION NOS. STAFF 1-1 THOUGH STAFF 1-2**

Pursuant to 16 Texas Administrative Code (TAC) § 22.144, the Staff (Staff) of the Public Utility Commission of Texas (Commission) requests that CSWR-Texas Utility Operating Company, LLC (Applicant), by and through their attorneys of record, 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, 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: August 13, 2020

Respectfully submitted,

**PUBLIC UTILITY COMMISSION OF TEXAS
LEGAL DIVISION**

Rachelle Nicolette Robles
Division Director

Heath D. Armstrong
Managing Attorney

/s/ Megan Chalifoux
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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 August 13, 2020, in accordance with the Order Suspending Rules, issued in Project No. 50664.

/s/ Megan Chalifoux
Megan Chalifoux

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**COMMISSION STAFF'S FIRST REQUEST FOR INFORMATION
TO CSWR TEXAS UTILITY OPERATING COMPANY, LLC
QUESTION NOS. STAFF 1-1 THROUGH STAFF 1-2**

DEFINITIONS

- 1) "Applicant" or "you" refers to CSWR-Texas Utility Operating Company, LLC and any person acting or purporting to act on their behalf, including, without limitation, attorneys, agents, advisors, investigators, representatives, employees, or other persons.

- 2) "CSWR" refers to the parent company CSWR, LLC and Subsidiaries and any person acting or purporting to act on their behalf, including, without limitation, attorneys, agents, advisors, investigators, representatives, employees, or other persons.

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

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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- Staff 1-1 Please provide the following:
- a) the most current bank statement reflecting the cash account balance of CSWR;
 - b) the most recent year-to-date, interim financial statements of CSWR for 2020; and
 - c) an explanation of CSWR's plans on becoming profitable and an estimate as to when CSWR will become profitable.
- Staff 1-2 Provide the specific reasons that CSWR is in a loss position. For each reason, provide the dollar effect on annual revenues and the estimated dollar effect on revenues for the future two years.