



## Filing Receipt

**Received - 2021-08-31 10:55:29 AM**  
**Control Number - 51398**  
**ItemNumber - 25**

**PUC DOCKET NO. 51398**

<b>APPLICATION OF EAST CRAWFORD</b>	<b>§</b>	<b>PUBLIC UTILITY COMMISSION</b>
<b>WATER CORPORATION AND NORTH</b>	<b>§</b>	
<b>BOSQUE WATER SUPPLY</b>	<b>§</b>	<b>OF TEXAS</b>
<b>CORPORATION FOR SALE,</b>	<b>§</b>	
<b>TRANSFER, AND MERGER OF</b>	<b>§</b>	
<b>A PORTION OF WATER FACILITIES</b>	<b>§</b>	
<b>AND CERTIFICATE RIGHTS IN</b>	<b>§</b>	
<b>MCLENNAN COUNTY</b>		

**EAST CRAWFORD'S RESPONSE TO  
COMMISSION STAFF'S FIRST REQUEST FOR INFORMATION**

**COMES NOW** East Crawford Water Supply Corporation (East Crawford) and files this Response to the First Request for Information (RFI) filed by the Staff of the Public Utility Commission of Texas (Staff). The discovery request was received by East Crawford on August 12, 2021. Therefore, this response is timely filed. Pursuant to P.U.C. PROC. R. 22.144(c)(2)(F), these responses may be treated as if they were filed under oath.

Dated: August 31<sup>st</sup>, 2021

Respectfully submitted,

**CARPENTER & CROFT, PLLC**

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Mary Margaret Croft

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**ATTORNEYS FOR EAST CRAWFORD**

**WATER SUPPLY CORPORATION**

**CERTIFICATE OF SERVICE**

I certify that a copy of this document will be served on all parties of record on this the 31<sup>st</sup> day of August, 2021 in accordance with 16 TAC § 22.74, as amended by PUC Order Suspending Rules issued in Project No. 50664.

Mary Margaret Croft  
Mary Margaret Croft

**PUC DOCKET NO. 51398**

**EAST CRAWFORD'S RESPONSE TO COMMISSION STAFF'S  
FIRST REQUEST FOR INFORMATION**

**Staff RFI No. 1-1**      How does East Crawford intend on addressing the City of Waco's Certificate of Convenience and Necessity in their application?

**Response:**              East Crawford intends to reach an agreement with the City of Waco and North Bosque Water Supply Corporation ("**North Bosque**") concerning dual certification within the areas in which East Crawford's expanded CCN overlaps with the City of Waco's CCN, if such an agreement can be reached. Such an agreement seems reasonable given that the City of Waco does not have water facilities located near and is not capable of providing water service to applicants for service in such portions of its CCN and given that North Bosque and East Crawford are capable of providing water services to such applicants for service. If such an agreement cannot be reached timely between the parties, then East Crawford will consider and possibly pursue other available means of providing water service to such affected areas.

**The foregoing Responses are based on information known to East Crawford at this time. East Crawford will supplement these Responses as required if East Crawford becomes aware of additional responsive information.**

[Affidavit Appears on Following Page]

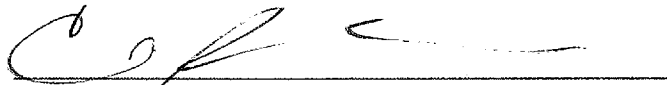
STATE OF TEXAS

§

COUNTY OF MCLENNAN

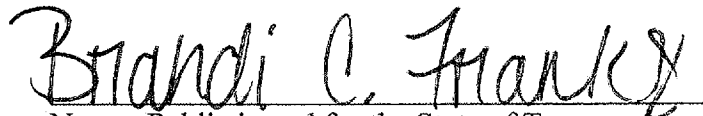
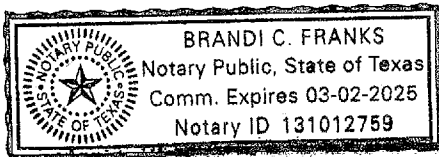
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BEFORE ME, the undersigned authority, personally appeared Clay Plemons, President of East Crawford Water Supply Corporation, known to me to be a credible person, qualified to make this affidavit, and, being duly sworn, stated on his oath that he has read the foregoing Responses to Request for Information, and that they are true and accurate to the best of his knowledge.



Clay Plemons, President of  
East Crawford Water Supply Corporation

SWORN TO AND SUBSCRIBED BEFORE ME by the said Clay Plemons, President of East Crawford Water Supply Corporation, on this the 27th day of August, 2021, to certify which witness my hand and seal of office.

  
Notary Public in and for the State of Texas