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Mr. Ruiz's Direct Line (512) 322-5887  
Email [cruiz@lglawfirm.com](mailto:cruiz@lglawfirm.com)

December 7, 2020

Ms. Cheryl Maples, General Manager  
Old Highway 90 Water Service  
P.O. Box 100  
Castroville, Texas 78009

Re: Yancey Water Supply Corporation's Ability to Serve Sand Hurst Subdivision

Dear Ms. Maples:

Old Highway 90 Water Service (OH90) recently issued a notice to the Yancey Water Supply Corporation (Yancey WSC), informing Yancey WSC of its plans to file an application with the Public Utility Commission of Texas (PUC) to amend its water certificate of convenience and Necessity (CCN) in Medina County, Texas. The notice included a questionnaire, and requested that Yancey WSC complete the questionnaire so that it may be included with OH90's CCN Amendment Application.

As you know, Yancey WSC General Manager Temple Mangold immediately followed up on the questionnaire, emailing you a copy on October 29, 2020, and indicating Yancey WSC's ability to serve. Shortly thereafter, our firm corresponded with you in writing to advise that our client Yancey WSC is willing and able to provide water service to the Sand Hurst Subdivision, and to expect a more detailed response about its willingness and capacity to serve.

This letter and its attachments serve as Yancey WSC's formal response to OH90's notice and questionnaire. Please submit this letter, our firm's email correspondence, the OH90 Notice and Yancey WSC's Completed Questionnaire, and the Addendum to the Questionnaire with you're your application. For convenient reference, the email correspondence, notice and questionnaire, and addendum are each attached.

If you have any questions, you may contact me at the phone number or email listed at the top of this page.

Sincerely,

C. Cole Ruiz

CCR/gjb

Old Highway 90 Water Service  
P.O. Box 100 | 145 PR 4775  
Castroville, TX 78009  
Office: 830-931-9272  
Fax: 830-931-2714  
Email: oldhighway90water@yahoo.com

October 14, 2020

To Whom It May Concern:

Please be advised that Old Highway 90 Water Service is filing an application with the Public Utility Commission (PUC) to amend its Water Certificate of Convenience and Necessity (CCN) Number 12975 to include the Sand Hurst Subdivision, shown on enclosed map.

You have been identified as a neighboring utility of like kind and/or municipality within 2 miles of the proposed service area. Pursuant to TCEQ Regulations, Old Highway 90 Water Service formally asks whether you are willing or able to provide water service to this proposed property sufficient to meet the TCEQ's minimum service standards plus local demands thereby providing continuous and adequate utility service to the consuming public. Please fill out the questionnaire below and return to us - it will be filed with the PUC.

You may email your response to oldhighway90water@yahoo.com. If you have any questions, please call us at 830-931-9272.

Sincerely,

Cheryl Maples  
General Manager  
Old Highway 90 Water Service

Name of Utility: Yancey Water Supply Corp Date of Response: 10/29/2020

Ability to Provide Service: Y N | Reason: \_\_\_\_\_

Printed Name: Scotter Mangold Title: General Manager

Phone Number: 830-741-5264 Email: Scotter.Mangold@yanceywater.com

Signature: Scotter Mangold

## Addendum to Questionnaire

Yancey WSC is non-profit water supply corporation organized and operating under Chapter 67 of the Texas Water Code. Yancey WSC is uniquely positioned to provide continuous and adequate water service to the Sand Hurst Subdivision for the following reasons:

- Yancey WSC holds Water CCN No. 11463, has been in operation since 1978, and currently provides continuous and adequate retail water service to 8,103 customers (2,701 connections) principally in Medina County.
- Yancey WSC's existing CCN and facilities are geographically situated close to the Sand Hurst Subdivision. Yancey WSC's nearest facilities are located within 5 miles of the proposed Sand Hurst Subdivision.
- Yancey WSC possesses the financial, managerial and technical capability to provide continuous and adequate service to the proposed Sand Hurst Subdivision. Yancey WSC has the staff capacity to be responsive to customer needs within the Sand Hurst Subdivision and to provide cost-effective, continuous and adequate service to the proposed Sand Hurst Subdivision. Yancey WSC is operated by a staff with the appropriate state-mandated licensure, including a general manager, operations manager, five field employees, and four office employees, and engages the firm of Southwest Engineers, Inc. for engineering services.
- Yancey WSC's existing facilities have the capacity to serve the entire Sand Hurst Subdivision.
- Due to Yancey WSC's customer base, Yancey WSC can offer economies of scale with cost-effective retail water service.

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You may email your response to oldhighway90water@yahoo.com. If you have any questions, please call us at 830-931-9272.

Sincerely,

Cheryl Maples  
General Manager  
Old Highway 90 Water Service

-----  
Name of Utility: Moore Water Supply Corp. Date of Response: 12 / 3 /2020

Ability to Provide Service: Y / Nx | Reason: Out of our CCN

Printed Name: Ray Freitas Title: Manager

Phone Number: 830 663-6344 Email: moorewsc@gmail.com

Signature: Ray Freitas

RE: Water utility service and CCN matters regarding Sand Hurst Subdivision

From: Cole Ruiz (cruiz@lglawfirm.com)

To: mgershon@lglawfirm.com; oldhighway90water@yahoo.com

Cc: scootermangold@yanceywater.com; acooper@lglawfirm.com; neal.goedrich@swengineers.com

Date: Monday, December 7, 2020, 10:11 AM CST

Ms. Maples,

Good morning. I'm following up on my colleague, Mike Gershon's email below. I've attached for your records Yancey WSC's complete response to Old Highway 90 Water Service's notice and questionnaire regarding the provision of retail water service to the Sand Hurst Subdivision.

Please feel free to reach me or Mr. Gershon if you have any questions.

Thank you,

Cole

C. COLE RUIZ  
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[NEW!!! Podcast- Listen In With Lloyd Gosselink](#)  
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**From:** Mike Gershon <mgershon@lglawfirm.com>  
**Sent:** Thursday, October 29, 2020 12:21 PM  
**To:** 'oldhighway90water@yahoo.com' <oldhighway90water@yahoo.com>  
**Cc:** Temple "Scooter" Mangold <scootermangold@yanceywater.com>, Cole Ruiz <cruiz@lglawfirm.com>; Audrey Cooper <acooper@lglawfirm.com>  
**Subject:** Water utility service and CCN matters regarding Sand Hurst Subdivision

Ms. Maples,

Good afternoon. Our law firm represents Yancey Water Supply Corporation and has been working with its Board of Directors and General Manager Scooter Mangold on CCN and service-related matters in the area near and including the Sand Hurst Subdivision. If you are represented by an attorney, please let me know and I will be glad to communicate directly with them.

Following up on your request, Yancey WSC is willing and able to provide service to the Sand Hurst Subdivision identified in your attached request. Please expect Yancey WSC's more detailed response about its capability to serve as a supplement to the attached form by Monday. Mr. Mangold forwarded the attached form to make you aware that Yancey is able to serve, and then instructed us to coordinate a more detailed response with him and his engineering firm, Southwest Engineers.

Please attach this email and the forthcoming supplement to your utility's CCN application. If you have any questions or would like to discuss this matter, please do not hesitate to contact me.

Thank you,

Mike

**MICHAEL A. GERSHON**  
Principal  
512.322.5872 Direct  
512.750.9628 Cell  
Lloyd Gosselink Rochelle & Townsend, P.C.  
816 Congress Ave., Suite 1900, Austin, TX 78701  
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Response to Old Hwy 90 Water Questionnaire\_Re Sand Hurst Subdivision.pdf  
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