



Control Number: 51657



Item Number: 7

Addendum StartPage: 0

DOCKET NO. 51657

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APPLICATION OF THE CITY OF ANNA §
TO AMEND ITS CERTIFICATE OF §
CONVENIENCE AND NECESSITY IN §
COLLIN COUNTY §
§

PUBLIC UTILITY COMMISSION
PUBLIC UTILITY DEPARTMENT
FILING CLERK
OF TEXAS

**COMMISSION STAFF'S FIRST REQUEST FOR INFORMATION
TO THE CITY OF ANNA
QUESTION NOS. STAFF 1-1 THROUGH 1-7**

Pursuant to 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 the City of Anna by and 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 2, 2021

Respectfully submitted,

**PUBLIC UTILITY COMMISSION OF TEXAS
LEGAL DIVISION**

Rachelle Nicolette Robles
Division Director

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Managing Attorney

/s/ M. Justin Ackley
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DOCKET NO. 51657

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 2, 2021, in accordance with the Order Suspending Rules, issued in Project No. 50664.

/s/ M. Justin Ackley
M. Justin Ackley

DOCKET NO. 51657

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DEFINITIONS

- 1) "City of Anna," "Anna" or "you" refers to the City of Anna 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.

DOCKET NO. 51657

**COMMISSION STAFF'S FIRST REQUEST FOR INFORMATION
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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 For each of the four alleged violations that are listed in the "TCEQ Exit Interview Form: Potential Violations and/or Records Request", please provide a brief explanation listing the actions taken or being taken by the utility to correct each alleged violation, including proposed completion dates. LP seeks to decertify.

Staff 1-2 Please provide a detailed map identifying the existing facility lines and customers within the requested area in reference to parcels, verifiable man-made and natural landmarks such as roads, rivers, and railroads. Please include the following in the requested map: the 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) Parcel belonging to a current customer,
- 2) Parcels with requests for service,
- 3) Existing facilities pass through or by the parcel,
- 4) Parcels where a portion is already inside the currently existing CCN, and
- 5) Parcels lying between two parcels that fall under either item 1, 2, 3, or 4 above.
- 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)	Outside City Limits (Y/N)	Outside ETJ (Y/N)

Staff 1-3 Please provide a written explanation supporting the need for service for any parcel in the requested area that does not contain current customers or existing facilities, does not have a pending request for service, and is not located in between parcels that contain current customers or existing facilities or have a pending request for service.

Staff 1-4 Please provide a written narrative supporting the need for service for the entire requested area as shown on the detailed map and table.

Staff 1-5 For each of the categories requested above please provide the acreage. For those parcels that are partially in the CCN include only the acreage in the current requested area.

Staff 1-6 Please provide the number of current customer connections and requests for service in the requested areas.

Staff 1-7 Please provide a detailed map showing the boundaries of the requested CCN area and the city limit and extraterritorial jurisdiction (ETJ) boundaries. Also provide the connection count and acreage for each of the following:

- a. The area within the city limits;
- b. The area within the ETJ; and
- c. The area outside the city limits and ETJ