



Filing Receipt

Received - 2021-08-26 12:04:00 PM

Control Number - 51683

ItemNumber - 30

DOCKET NO. 51683

APPLICATION OF INTEGRA WATER	§	PUBLIC UTILITY COMMISSION
TEXAS, LLC FOR A SEWER	§	
CERTIFICATE OF CONVENIENCE	§	OF TEXAS
AND NECESSITY IN BASTROP	§	
COUNTY	§	

**COMMISSION STAFF'S SECOND REQUEST FOR INFORMATION
TO INTEGRA WATER TEXAS, LLC
QUESTION NOS. STAFF 2-1 THROUGH 2-3**

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 Integra Water Texas, LLC 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 Project No. 50664.

Dated: August 26, 2021

Respectfully submitted,

**PUBLIC UTILITY COMMISSION OF TEXAS
LEGAL DIVISION**

Rachelle Nicolette Robles
Division Director

Rustin Tawater
Managing Attorney

/s/ Robert Dakota Parish
Robert Dakota Parish
State Bar No. 24116875
1701 N. Congress Avenue
P.O. Box 13326
Austin, Texas 78711-3326
(512) 936-7442
(512) 936-7268 (facsimile)
Robert.Parish@puc.texas.gov

DOCKET NO. 51683

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 26, 2021, in accordance with the Order Suspending Rules, issued in Project No. 50664.

/s/ Robert Dakota Parish
Robert Dakota Parish

DOCKET NO. 51683

**COMMISSION STAFF'S SECOND REQUEST FOR INFORMATION
TO INTEGRA WATER TEXAS, LLC
QUESTION NOS. STAFF 2-1 THROUGH 2-3**

DEFINITIONS

- 1) "Integra WT" or the "Company" or "you" refers to Integra Water Texas, 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) "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 Cooperative, Inc.'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. 51683

**COMMISSION STAFF'S SECOND REQUEST FOR INFORMATION
TO INTEGRA WATER TEXAS, LLC
QUESTION NOS. STAFF 2-1 THROUGH 2-3**

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.

DOCKET NO. 51683

**COMMISSION STAFF'S SECOND REQUEST FOR INFORMATION
TO INTEGRA WATER TEXAS, LLC
QUESTION NOS. STAFF 2-1 THROUGH 2-3**

- Staff-2-1** Please provide a sworn affidavit or other written binding guarantee that Integra Water, LLC, Integra Water Texas, LLC's parent company, is willing and capable to cover any temporary cash shortages for the first 5 years of operations.
- Staff 2-2** Please refer to Integra's March 4, 2021 Response to Order No. 2 and Supplement to Application at Attachment A on Pg. 15. The development agreement for the requested area was entered into with the developer Cayetano Development by Integra Water Tennessee, LLC and not Integra Water Texas, LLC. Please provide a written agreement or other documentation that shows what rights, obligations, and/or relationship Integra Water Texas, LLC will have in relation to the development agreement.
- Staff 2-3** Please refer to Integra's March 4, 2021 Response to Order No. 2 and Supplement to Application at Attachment A on Pg. 3. What rights, obligations, and/or relationship does the Escrow Agreement entered into by Integra Water Texas, LLC and Centex Los Milagros, L.P create for the parties in relationship to the December 20, 2018 Design, Permitting, Construction, Ownership, Operation and Maintenance Agreement that was originally entered into by Integra Water Tennessee, LLC and Cayetano Development.