



Control Number: 51698



Item Number: 7

Addendum StartPage: 0

DOCKET NO. 51698

RECEIVED

2021 MAR -3 PM 2:50

PUBLIC UTILITY COMMISSION

**PUBLIC UTILITY COMMISSION
OF TEXAS**
FILING CLERK

**PETITION OF TRENDMAKER §
HOMES, INC. TO AMEND MSEC §
ENTERPRISES, INC.'S CERTIFICATE §
OF CONVENIENCE AND NECESSITY §
IN MONTGOMERY COUNTY BY §
EXPEDITED RELEASE §**

**COMMISSION STAFF'S FIRST REQUEST FOR INFORMATION TO TRENDMAKER
HOMES, INC. QUESTION NOS. STAFF 1-1 THROUGH 1-3**

The Staff (Staff) of the Public Utility Commission of Texas (Commission) requests that Trendmaker Homes, Inc. (Trendmaker) 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, Trendmaker must submit an amended answer, under oath, as a supplement to its 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 that 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.

7

Dated: March 3, 2021

Respectfully submitted,

**PUBLIC UTILITY COMMISSION OF TEXAS
LEGAL DIVISION**

Rachelle Nicolette Robles
Division Director

Eleanor D'Ambrosio
Managing Attorney

/s/ Merritt Lander
Merritt Lander
State Bar No. 24106183
1701 N. Congress Avenue
P.O. Box 13326
Austin, Texas 78711-3326
(512) 936-7290
(512) 936-7268 (facsimile)
Merritt.Lander@puc.texas.gov

DOCKET NO. 51698

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 on March 3, 2021 in accordance with the Order Suspending Rules filed in Project No. 50664.

/s/ Merritt Lander
Merritt Lander

DOCKET NO. 51698

**COMMISSION STAFF'S FIRST REQUEST FOR INFORMATION TO TRENDMAKER
HOMES, INC. QUESTION NOS. STAFF 1-1 THROUGH 1-3**

DEFINITIONS

- 1) "Trendmaker" or "you" refers to Trendmaker Homes, Inc. and any person acting or purporting to act on its behalf, including, without limitation, attorneys, agents, advisors, investigators, representatives, employees or other persons.
- 2) "Tract" refers to the property in Montgomery County that is the subject of Trendmaker Homes, Inc.'s petition for streamlined expedited release.

DOCKET NO. 51698

**COMMISSION STAFF'S FIRST REQUEST FOR INFORMATION TO TRENDMAKER
HOMES, INC. QUESTION NOS. STAFF 1-1 THROUGH 1-3**

INSTRUCTIONS

- 1) Pursuant to 16 Texas Administrative Code (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. 51698

**COMMISSION STAFF'S FIRST REQUEST FOR INFORMATION TO TRENDMAKER
HOMES, INC. QUESTION NOS. STAFF 1-1 THROUGH 1-3**

- Staff 1-1** Please identify each time period in the last five years, if any, during which the Tract received water or sewer service and identify the retail public utility that provided the service.
- Staff 1-2** If known, please identify the number of water connections that will be needed to serve the tract and the projected timeline for the installation of these connections.
- Staff 1-3** If known, please identify the number of sewer connections that will be needed to serve the tract and the projected timeline for the installation of these connections.