



Control Number: 51698



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DOCKET NO. 51698

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

PUBLIC UTILITY COMMISSION

OF TEXAS
PUBLIC UTILITY COMMISSION
FILING CLERK

**COMMISSION STAFF'S FIRST REQUEST FOR INFORMATION TO MSEC
ENTERPRISES, INC. QUESTION NOS. STAFF 1-1 THROUGH 1-11**

The Staff (Staff) of the Public Utility Commission of Texas (Commission) requests that MSEC Enterprises, Inc. (MSEC) 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, MSEC 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.

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 _____
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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

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**COMMISSION STAFF'S FIRST REQUEST FOR INFORMATION TO MSEC
ENTERPRISES, INC. QUESTION NOS. STAFF 1-1 THROUGH 1-11**

DEFINITIONS

- 1) "MSEC" or "you" refers to MSEC Enterprises, 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.

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**COMMISSION STAFF'S FIRST REQUEST FOR INFORMATION TO MSEC
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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.

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**COMMISSION STAFF'S FIRST REQUEST FOR INFORMATION TO MSEC
ENTERPRISES, INC. QUESTION NOS. STAFF 1-1 THROUGH 1-11**

- Staff 1-1** Please provide any contracts for water service to the Tract executed in the last 12 months.
- Staff 1-2** Please provide any bills for water service to the Tract issued in the last 12 months.
- Staff 1-3** Please provide any other documents demonstrating that MSEC Enterprises, Inc. provided water service to the Tract in the last 12 months.
- Staff 1-4** Please describe any water meters located within the Tract and provide the date on which each meter was last active.
- Staff 1-5** Please describe any water lines located within the Tract, including the diameter of the line, the length of the portion of the line that is located within the Tract, and the date the line was put in service.
- Staff 1-6** Please describe any water lines that are located in close proximity to, but not within, the Tract. For each line described, please include the diameter, the length of the portion of the line that is in close proximity to the Tract, and the date the line was placed into service.
- Staff 1-7** Please describe any water facilities located within the Tract, including the total capacity of the facility, the current unused capacity of the facility, and the date the facility was placed into service.
- Staff 1-8** Please describe any water facilities that are located in close proximity to, but not within, the Tract. For each facility described, please include the total capacity of the facility, the current unused capacity of the facility, and the date the facility was placed into service.
- Staff 1-9** Please provide a detailed map showing the location of all meters, lines, and facilities described in response to Question Nos. Staff 1-4 through 1-8.
- Staff 1-10** For each meter, line, or facility described in response to Question Nos. Staff 1-4 through 1-8, please provide the distance of each meter, line, or facility from the outer boundary of the Tract.
- Staff 1-11** For each meter, line, or facility described in response to Question Nos. Staff 1-4 through 1-8, please explain how the meter, line, or facility is committed to providing water service to the Tract.