



Control Number: 51738



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DOCKET NO. 51738



**PETITION OF SANCTUARY TEXAS, §
LLC TO AMEND AQUA TEXAS, INC.'S §
CERTIFICATE OF CONVENIENCE §
AND NECESSITY IN DENTON §
COUNTY BY EXPEDITED RELEASE §**

**PUBLIC UTILITY COMMISSION
OF TEXAS**

**COMMISSION STAFF'S FIRST REQUEST FOR INFORMATION
TO AQUA TEXAS, INC.
QUESTION NOS. STAFF 1-1 THROUGH STAFF 1-10**

Pursuant to 16 Texas Administrative Code (TAC) § 22.144, the Staff of the Public Utility Commission of Texas (Staff) requests that Aqua Texas, Inc., by and through its attorneys of record, 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, 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 19, 2021

Respectfully submitted,

**PUBLIC UTILITY COMMISSION OF TEXAS
LEGAL DIVISION**

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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 February 19, 2021, in accordance with the Order Suspending Rules, issued in Project No. 50664.

/s/ Creighton R. McMurray
Creighton R. McMurray

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**COMMISSION STAFF'S FIRST REQUEST FOR INFORMATION
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QUESTION NOS. STAFF 1-1 THROUGH STAFF 1-10**

DEFINITIONS

- A. "Aqua" or "you" refers to Aqua Texas, Inc. and any person acting or purporting to act on its behalf, including without limitation, attorneys, agents, advisors, investigators, representatives, employees or other persons.
- B. "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 partial documents which do exist and these documents will be provided.
- C. "Tract" is defined as the property for which the petitioner is seeking streamlined expedited release.

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**COMMISSION STAFF'S FIRST REQUEST FOR INFORMATION
TO AQUA TEXAS, INC.
QUESTION NOS. STAFF 1-1 THROUGH STAFF 1-10**

- 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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TO AQUA TEXAS, INC.
QUESTION NOS. STAFF 1-1 THROUGH STAFF 1-10**

- Staff 1-1 Please provide any contracts of for water service to Sanctuary Texas, LLC 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 Aqua 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 explain how the meter, line, or facility is committed to providing water service to the Tract.