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DOCKET NO. 51870

APPLICATION OF FOREST GLEN  
UTILITY COMPANY TO AMEND ITS  
SEWER CERTIFICATE OF  
CONVENIENCE AND NECESSITY IN  
MEDINA COUNTY

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§  
§

BEFORE THE  
PUBLIC UTILITY COMMISSION  
OF TEXAS

2021 MAY 17 PM 1:26

RECEIVED  
MAY 17 2021

**FOREST GLEN UTILITY COMPANY'S**  
**SUPPLEMENTAL RESPONSE TO COMMISSION STAFF'S FIRST REQUEST FOR**  
**INFORMATION**

**TO THE PUBLIC UTILITY COMMISSION STAFF**, by and through their attorney of record Kevin Bartz, Legal Division, Public Utility Commission of Texas, P.O. Box 13326, Austin, Texas 78711-3326.

COMES NOW, Forest Glen Utility Company ("Forest Glen") and submits this Supplemental Response to the Public Utility Commission Staff's ("Commission Staff") First Request for Information ("RFI") pursuant to Tex. R. Civ. P. 190 through 198 and 16 Tex. Admin. Code § 22.144 ("TAC"). Pursuant to 16 TAC § 22.144(c)(2)(F), these responses may be treated as if they were filed under oath.

Respectfully submitted,

Randall B. Wilburn  
State Bar No. 24033342  
Helen S. Gilbert  
State Bar No. 00786263  
BARTON BENSON JONES PLLC  
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By:

*Helen S. Gilbert*

Helen S. Gilbert

**ATTORNEYS FOR FOREST GLEN  
UTILITY COMPANY**

**CERTIFICATE OF SERVICE**

I hereby certify that I have or will serve a true and correct copy of the foregoing document via hand delivery, facsimile, electronic mail, overnight mail, U.S. mail, or Certified Mail Return Receipt Requested on all parties on the 17th of May 2021.

*Helen S. Gilbert*

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Helen S. Gilbert

**SUPPLEMENTAL RESPONSE TO COMMISSION STAFF'S FIRST REQUEST FOR  
INFORMATION TO  
FOREST GLEN UTILITY COMPANY  
QUESTION NOS. STAFF 1-1 THROUGH 1-2**

Staff 1-1: For the requested area, please provide a capital improvement plan, including a budget and an estimated timeline for construction, of all facilities necessary to provide full service to the requested area, keyed to a map showing where such facilities will be located to provide service.

**RESPONSE: Details of Forest Glen's proposed construction are being produced confidentially pursuant to 16 TAC § 22.71(d), Bates No. FGU000095-000140.**

Staff 1-2: Provide proof of funding sources, such as developer agreements, approved loan documents, or any other approved funding source, to construct all facilities to serve the requested area.

**RESPONSE: Developer Agreements are being produced confidentially pursuant to 16 TAC § 22.71(d), Bates No. FGU000095-000140.**