



Control Number: 51870



Item Number: 106

Addendum StartPage: 0

DOCKET NO. 51870

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

RECEIVED
BEFORE THE
2021 JUN -2 AM 10:20
PUBLIC UTILITY COMMISSION
OF TEXAS
CLERK

FOREST GLEN UTILITY COMPANY'S
SECOND 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 Second 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:

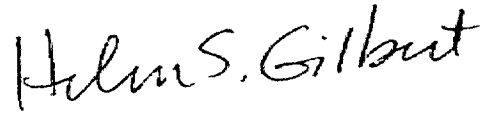
Helen S. Gilbert

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 2nd of June 2021.



Helen S. Gilbert

**SECOND SUPPLEMENTAL RESPONSE TO COMMISSION STAFF'S FIRST REQUEST FOR
INFORMATION TO
FOREST GLEN UTILITY COMPANY
QUESTION NO. STAFF 1-2**

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: Proof of funding sources to construct facilities are being produced confidentially pursuant to 16 TAC § 22.71(d), Bates No. FGU000141-000149.