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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

RECEIVED
2021 MAY -4 PM 4:46
§ BEFORE THE
§ PUBLIC UTILITY COMMISSION
§ OF TEXAS
§

**FOREST GLEN UTILITY COMPANY'S
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 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
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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 4th of May 2021.

Helen S. Gilbert

Helen S. Gilbert

**RESPONSES 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: Forest Glen is an investor-owned utility and not a governmental entity required to prepare a Capital Improvement Plan; however, this Response will be supplemented when the budget and associated documents responsive to this request are finalized and available for production.

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: Forest Glen's response to this request will be supplemented and any responsive information will be produced confidentially when available.