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PUC DOCKET NO. 51979

PETITION BY SIG MAGNOLIA LP § BEFORE THE
FOR EXPEDITED RELEASE §
FROM WATER CCN NO. 11052 § PUBLIC UTILITY COMMISSION
HELD BY DOBBIN PLANTERSVILLE §
WATER SUPPLY CORPORATION § OF TEXAS

**SIG MAGNOLIA LP'S REQUESTS FOR INFORMATION TO DOBBIN
PLANTERSVILLE WATER SUPPLY CORPORATION**

TO THE PUBLIC UTILITY COMMISSION OF TEXAS:

COMES NOW, SIG Magnolia LP (Petitioner) and files this First Set of Requests for Information (RFIs) to Dobbin Plantersville Water Supply Corporation (Dobbin Plantersville) pursuant to 16 Tex. Admin. Code § 22.144. Responses to RFIs set forth below should be served on the undersigned counsel for SIG Magnolia within twenty (20) days of service hereof.

INSTRUCTIONS

1. These Requests for Information are governed by the definitions and instructions contained in the Public Utility Commission of Texas rules and the Texas Rules of Civil Procedure, which are supplemented as permitted by the specific instructions and definitions herein.
2. Written responses to these Requests for Information should be served twenty (20) days after service of these Requests upon you.
3. Your responses should conform to the rules of the Public Utility Commission of Texas and the Texas Rules of Civil Procedure.
4. In accordance with 16 Tex. Admin. Code Sec. 22.144, each RFI shall be answered separately, shall identify the preparer and the sponsoring witness, shall be preceded by the RFI, and all responses shall be filed under oath.
5. Each document that is made available for review in response to these RFIs shall be produced as it is kept in the usual course of business (i.e., in the file folder or binder in which the documents were located when the request was served) or the documents shall be organized or labeled to correspond to the category of documents requested.
6. If the documents requested herein include electronic data and magnetic data, they shall be produced in their native format with all metadata intact.

7. When answering these RFIs, you are requested to furnish all information available to you, including information in the possession of your attorneys, investigators, consultants, employees, agents, representatives, or any other person acting on your behalf, and not merely such information as is held or known by you personally.
8. In the event any document or other thing referred to in these RFIs is not in your possession, custody, or control, specify what disposition was made of it and identify the person or entity who now has possession, custody, or control of the document or thing.
9. If you object to any RFI, you must comply with 16 Tex. Admin. Code Sec. 22. 144(d), and you must contact the undersigned so that the parties may negotiate diligently and in good faith prior to the filing of an objection. Objections must be filed within ten (10) calendar days of receipt of these Requests.
10. Any agreement to extend the time to respond to these Requests for Information and Requests for Admission must be in writing. No extensions of time to object to any of the individual document requests should be presumed or assumed unless the agreement between counsel to extend the response date is specifically set forth in writing.
11. Unless otherwise noted in a specific request, the time period applicable to the requests is January 1, 2005, to the present.
12. Please take further notice that the RFIs are continuing in nature. Your answers and responses must include all documents that are currently in your possession, custody, and control and that come into your possession, custody, or control in the future.

DEFINITIONS

The following definitions are applicable to the RFIs.

1. “SIG Magnolia” or “Petitioner” refers to the SIG Magnolia LP.
2. “Dobbin Plantersville” or “WSC” refers to Dobbin Plantersville Water Supply Corporation, its officers, employees, consultants, agents, attorneys, and affiliates to the extent such persons are acting for or on behalf of Dobbin Plantersville Water Supply Corporation.
3. “Petition” is the Petition for expedited release from Dobbin Plantersville Water Supply Corporation’s water certificate of convenience and necessity (CCN) No. 11052, pursuant to Texas Water Code § 13.2541 and 16 Texas Administrative Code (TAC) § 24.245, submitted by SIG Magnolia to the Public Utility Commission of Texas on or about April 5, 2021, that is the subject of this docket.

4. "CCN" refers to certificate of convenience and necessity No. 11052, unless otherwise specified.
5. "Communication" shall mean the transmittal of information (in the form of acts, ideas, inquiries, or otherwise) by any method or manner between two or more persons.
6. "Document" and/or "Documents" refers to all written, reported, or graphic matter within the scope of Rules 22.141 and 22.144 of the Public Utility Commission of Texas, however produced or reproduced. Without limiting the foregoing, the terms include: papers, books, accounts, drawings, graphs, charts, photographs, electronic or videotape recordings, and any other data compilations from which information can be obtained and translated, if necessary, by the person from whom information is sought, into reasonably usable form, agreements, contracts, communications, correspondence, letters, faxes, email, instant message records, memoranda, records, reports, summaries, records of telephone conversations, diary entries, calendars, appointment books, drafts, notes, telephone bills or records, bills, statements, records of obligations and expenditures, invoices, lists, journals, receipts, checks, canceled checks, letters of credit, envelopes, folders, voice recordings, video recordings, electronic data, electronic media, and any other data or information that exists in written, electronic, or magnetic form.
7. "Describe" means to provide a detailed narrative concerning the information which is the subject of the RFI.
8. "Relate to," "related to," or "relating to" means concerning, referring to, having a relationship with or to, pertaining to, identifying, pertinent to, describing, explaining, summarizing, or to be otherwise factually, legally, or logically connected to the subject matter of the particular request.
9. The words "and" and "or" shall be construed either conjunctively or disjunctively as required by the context to bring within the scope of these requests any document that might be deemed outside its scope by another construction.

REQUESTS FOR INFORMATION

1. Please provide the WSC's current budget for Fiscal Year 2021 and the budget applicable for Fiscal Year 2020.
2. Please provide the WSC's Audited Financial Report for Fiscal Year Ended 2020, 2019, and 2018. If audited financials are unavailable, please provide Fiscal Year ended Balance Sheets, Income Statements, and Statements of Cash flow for the indicated period.
3. Please provide Dobbin Plantersville's currently applicable capital improvement plan and most recently completed Master Plan.
4. Please list the groundwater conservation districts that the WSC's CCN is located within and describe how the WSC obtains compliance with district mandates (e.g., payment of production fees to a Groundwater Reduction Plan administrator)
5. Please provide the annual gallons of water produced and gallons sold to customers for Fiscal Year Ended 2020, 2019, and 2018, as well as to-date Fiscal Year 2021.
6. Please provide copies of any contracts related to the purchase or sale of treated or raw water.
7. Please provide debt service schedules, by issuance, detailing annual payments of principal and interest remaining on each outstanding debt issue. Please indicate the projects/capital improvements funded by each outstanding bond issuance.
8. Please provide a map of the area proposed for decertification in relation to the remaining portions of the WSC System (System). On said map, please indicate all assets owned by the WSC currently used and useful in providing service to customers.
9. Please list all active connections within the area proposed for decertification by meter size.
10. Please list all active connections on the WSC's system by meter size.
11. Please provide a list of any fixed assets within the area proposed for decertification. Please indicate the size of any applicable water lines and the capacity of any pumps, storage tanks, or water production equipment.
12. Please list any fixed assets associated within the area proposed for decertification that would be rendered useless, or would be under-utilized, as a result of a decertification.
13. Please identify any assets in response to requests 10 or 11 that were grant funded or contributed by developers or customers.
14. Please identify any portions of the assets in response to items 10 or 11 that were funded by debt that is still outstanding.

15. Please provide the estimated cost of making adjustments to the WSC's system to facilitate the proposed decertification (e.g., improvements necessary to continue serving existing customers), if any.
16. Please provide invoices outlining the professional and legal fees incurred by the WSC associated with the decertification. Please continue to update request No. 15 during the pendency of the proceeding.
17. Please provide the cost of new infrastructure or improvements necessary to serve the area proposed for decertification and the anticipated timing required for installing said infrastructure.

Respectfully submitted,

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BY: *Emily W. Rogers*
Emily W. Rogers

CERTIFICATE OF SERVICE

I certify that a copy of this document was served on all parties of record via email on July 21, 2021, in accordance with the requirements of 16 Tex. Admin. Code § 22.74 and PUC Order No. 2 in Docket No. 50664.

Emily W. Rogers

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