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DOCKET NO. 52012

APPLICATION OF BRAZOS VALLEY	§	PUBLIC UTILITY COMMISSION
SEPTIC & WATER, INC. AND CSWR-	§	
TEXAS UTILITY OPERATING	§	OF TEXAS
COMPANY, LLC FOR SALE,	§	
TRANSFER, OR MERGER OF	§	
FACILITIES AND CERTIFICATE	§	
RIGHTS IN ROBERTSON COUNTY	§	

**WELLBORN SPECIAL UTILITY DISTRICT’S RESPONSES TO COMMISSION
STAFF’S FIRST REQUEST FOR INFORMATION TO WELLBORN SPECIAL
UTILITY DISTRICT QUESTION NOS. STAFF-1 THROUGH 1-2**

Wellborn Special Utility District (“Wellborn SUD”) hereby submits these responses to Commission Staff’s First Requests for Information to Wellborn Special Utility District. Pursuant to 16 Tex. Admin. Code § 22.144, these responses are timely filed. Wellborn SUD stipulates that the responses stated herein may be treated by all parties as if filed under oath. Pursuant to 16 Tex. Admin. Code § 22.144(c), Wellborn SUD files these responses without agreeing to the relevancy of the information sought and without waiving their right to object at the time of any hearing to the admissibility of the information provided herein.

Respectfully submitted,

JACKSON WALKER L.L.P.



Leonard Dougal – State Bar No. 06031400
Alicia French – State Bar Bo. 24074958
100 Congress, Suite 1100
Austin, Texas 78701
Telephone: (512) 236-2000
Facsimile: (512) 391-2112
Email: *ldougal@jw.com*

ATTORNEYS FOR WELLBORN SPECIAL
UTILITY DISTRICT

CERTIFICATE OF SERVICE

I hereby certify that notice of the filing of this document was provided to all parties of record via electronic mail on July 21, 2021, in accordance with the Order Suspending Rules, issued in Project No. 50664.



Leonard H. Dougal

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Staff 1-1 Please reference the Red Polygon, which is defined above. Please admit or deny that Wellborn is willing to continue to serve the four customers in the Red Polygon.

RESPONSE: ADMIT

SPONSORED BY: STEPHEN CAST, GENERAL MANAGER

PREPARED BY: STEPHEN CAST, GENERAL MANAGER

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Staff 1-2 Please reference the Blue Polygon, which is defined above. Please admit or deny that Wellborn is willing to serve the sixteen customers in the Blue Polygon.

- 1) If admit, please state the date when Wellborn can begin providing service.
- 2) If deny, please explain why Wellborn is unable to serve customers in its CCN service area.

RESPONSE: ADMIT. Wellborn is willing to begin serving the customers in the event that 1) CSWR-Texas does not oppose that action, withdraws the pending STM application, and releases the current utility from any conflicting contractual obligations; 2) the current utility conveys the water lines and facilities needed by Wellborn to serve, at no cost to Wellborn and free and clear of liabilities; 3) the customers sign Wellborn's standard new customer documentation, including a customer service agreement and pay the standard \$100 customer deposit; and 4) no STM application or other PUC approval is required for Wellborn to initiate such service – given that all of the subject customers are already located within Wellborn's retail water CCN (and Wellborn's original jurisdiction over its rates and policies). Wellborn can initiate this service within 14 days after the above are completed.

SPONSORED BY: STEPHEN CAST, GENERAL MANAGER

PREPARED BY: STEPHEN CAST, GENERAL MANAGER