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DOCKET NO. 52090

PETITION OF REDBIRD	§	PUBLIC UTILITY COMMISSION
DEVELOPMENT, LLC TO AMEND	§	
DOBBIN PLANTERSVILLE WATER	§	OF TEXAS
SUPPLY CORPORATION'S	§	
CERTIFICATE OF CONVENIENCE	§	
AND NECESSITY IN MONTGOMERY	§	
COUNTY BY EXPEDITED RELEASE	§	

DOBBIN PLANTERSVILLE'S RESPONSE TO COMMISSION STAFF'S FIRST REQUEST FOR INFORMATION

TO: The Public Utility Commission Staff, by and through its counsel of record, Phillip Lehrmann, 1701 N. Congress Avenuc, P.O. Box 13326, Austin, Texas 78711-3326

Intervenor and CCN Holder Dobbin Plantersville Water Supply Corporation ("Intervenor") files this Response to the Commission Staff's First Request for Information. The Intervenor's written responses to Commission Staff's requests are attached and incorporated by reference. The Intervenor's responses and responsive documents are given in the spirit of cooperation without waiving the District's right to contest the admissibility of any of this information at hearing. Pursuant to 16 Texas Administrative Code section 22.144(c)(2)(A), each response lists the preparer or person under whose direct supervision the response was prepared and the sponsoring witness, if any. Pursuant to 16 Texas Administrative Code section 22.144(c)(2)(F), the Intervenor stipulates that its responses may be treated by all parties as if they were made under oath. For purposes of these responses, Intervenor uses the same definitions set out in Staff's First Request for Information.

Respectfully submitted,

MARY K. SAHS, P.C. Wary K. Sahs

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ATTORNEY FOR DOBBIN PLANTERSVILLE WATER SUPPLY CORPORATION

DOCKET NO. 52090 CERTIFICATE OF SERVICE

I certify that, unless otherwise ordered by the presiding officer, notice of the filing of this document was provided to all parties of record on July 7, 2021 in accordance with the Order Suspending Rules filed in Project No. 50664.

Mary K. Sahs

Mary K. Sahs

DOCKET NO. 52090

INTERVENOR DOBBIN PLANTERSVILLE WSC'S RESPONSE TO COMMISSION STAFF'S FIRST REQUEST FOR INFORMATION

Staff 1-1 Provide any contracts for water service to the Redbird Development, LLC Tract executed in the last 12 months.

RESPONSE: None

Prepared by: Janic Legge, General Manager

Sponsored by: Janie Legge, General Manager

Staff 1-2 Provide any bills for water service to the Tract issued in the last 12 months.

RESPONSE: None

Prepared by: Janic Legge, General Manager

Sponsored by: Janie Legge, General Manager

Staff 1-3 Provide any other documents demonstrating that Dobbin-Plantersville Water Supply Corporation provided water service to the Tract in the last 12 months.

RESPONSE: None

Prepared by: Janie Legge, General Manager

Sponsored by: Janie Legge, General Manager

Staff 1-4 Describe any water or sewer meters located within the Tract and provide the date on which each meter was last active.

RESPONSE: None

Prepared by: Janie Legge, General Manager

Sponsored by: Janie Legge, General Manager

Staff 1-5 Describe any water or sewer lines located within the Tract, including the diameter of the line, the length of the portion of the line that is located within the Tract, and the date the line was put in service.

RESPONSE: None

Prepared by: Janie Legge, General Manager

Sponsored by: Janie Legge, General Manager

Staff 1-6 Describe any water or sewer lines that are located in close proximity to, but not within, the Tract. For each line described, include the diameter, the length of the portion of the line that is in close proximity to the Tract, and the date the line was placed into service.

RESPONSE: The Tract has frontage on Spring Branch Road for approximately sixty feet.

Of this, the entire length is paralleled by both a 6" diameter and a 4" diameter line. Together these have a TCEQ combined capacity for 350 active connections and

have been in service since prior to 2010.

Prepared by: Steve Duncan, Outside Engineering Consultant

Sponsored by: Steve Duncan, Outside Engineering Consultant

Staff 1-7 Describe any water or sewer facilities located within the Tract, including the

total capacity of the facility, the current unused capacity of the facility, and

the date the facility was placed into service.

RESPONSE: None

Prepared by: Janie Legge, General Manager

Sponsored by: Janie Legge, General Manager

Staff 1-8 Describe any water or sewer facilities that are located in close proximity to, but not within, the Tract. For each facility described, include the total capacity

of the facility, the current unused capacity of the facility, and the date the

facility was placed into service.

RESPONSE: Existing Water Plant 4 is located approximately 700 feet north of the Tract along Spring Branch Road. Dobbin Plantersville recently purchased an additional

along Spring Branch Road. Dobbin Plantersville recently purchased an additional acre of land adjacent to the plant site for its expansion. It has the following major components with their respective TCEQ connection capacity noted. The water plant was put into service in 1983 and upgraded in 2001 and 2012.

Water Well, 180 gallons per minute, 300 connections Ground Storage Tank, 84,000 gallons, 420 connections

Pressure Tank, 10,000 gallons, 500 connections

Booster Pumps, 600 gallons per minute total, 300 connections

Dobbin Plantersville currently has approximately 230 active connections for that portion of the Montgomery County interconnected system. Taken in isolation, water plant 4 has unused capacity to support 70 connections.

Prepared by: Steve Duncan, Outside Engineering Consultant

Sponsored by: Steve Duncan, Outside Engineering Consultant

Staff 1-9 Provide a detailed map showing the location of all meters, lines, and facilities

described in response to Question Nos. Staff 1-4 through 1-8.

RESPONSE: See attached Exhibit A.

Prepared by: Steve Duncan, Outside Engineering Consultant

Sponsored by: Steve Duncan, Outside Engineering Consultant

Staff 1-10 For each meter, line, or facility described in response to Question Nos. Staff 1-

4 through 1-8, provide the distance of each meter, line, or facility from the

outer boundary of the Tract.

RESPONSE: See attached Exhibit A.

Prepared by: Steve Duncan, Outside Engineering Consultant

Sponsored by: Steve Duncan, Outside Engineering Consultant

Staff 1-11 For each meter, line, or facility described in response to Question Nos. Staff 1-

4 through 1-8, explain how the meter, line, or facility is committed to providing

water service to the Tract.

RESPONSE: The water lines discussed in Question No. Staff 1-6 are committed to

providing water service to properties along Spring Branch Road. This includes the subject tract, as the water lines runs parallel and are adjacent to the tract and has

excess capacity.

Dobbin Plantersville water plants are committed to providing water service to the CCN area. Water Plant 4 discussed in Question No. Staff 1-8 serves the area primarily south of State Highway 105 and east of Lake Creek which includes the subject tract. It is committed to providing water service to the subject tract as it is sited very near the tract and has excess capacity. Dobbin Plantersville has also

recently purchased land for its expansion.

Prepared by: Steve Duncan, Outside Engineering Consultant

Sponsored by: Steve Duncan, Outside Engineering Consultant

