



## Filing Receipt

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**PUC DOCKET NO. 52090**

<b>PETITION BY REDBIRD</b>	<b>§</b>	<b>BEFORE THE</b>
<b>DEVELOPMENT, LLC FOR</b>	<b>§</b>	
<b>EXPEDITED RELEASE</b>	<b>§</b>	
<b>FROM WATER CCN NO. 11052</b>	<b>§</b>	<b>PUBLIC UTILITY COMMISSION</b>
<b>HELD BY DOBBIN PLANTERSVILLE</b>	<b>§</b>	
<b>WATER SUPPLY CORPORATION</b>	<b>§</b>	<b>OF TEXAS</b>

**DOBBIN PLANTERSVILLE WSC’S RESPONSE TO  
REDBIRD DEVELOPMENT REQUESTS FOR INFORMATION**

TO: Redbird Development, LLC, by and through its counsel of record, Emily W. Rogers, Bickerstaff, Heath Delgado Acosta, LLP, 3711 S. MoPac Expressway, Building One, Suite 300, Austin, Texas 78746.

Dobbin Plantersville Water Supply Corporation (“Dobbin Plantersville”) files this its Response to Redbird Development, LLC’s (“Redbird”) Requests for Information (“RFIs”), within 20 days of the date on which the RFIs were filed (July 12, 2021). These responses are timely filed. Dobbin Plantersville’s General Manager became ill during preparation of these responses; therefore, it will be necessary to supplement the responses as soon as she has recovered and returned to work.

Dobbin Plantersville’s written responses and responsive documents are attached hereto and incorporated by reference. Dobbin Plantersville’s responses are made in the spirit of cooperation without waiving Dobbin Plantersville’s right to contest the admissibility of any of this information. 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 Texas Administrative Code section 22.144(c)(2)(F), Dobbin Plantersville stipulates that its responses may be treated by all parties as if they were made under oath. For purposes of these responses, Respondent uses the same definitions set out in Redbird’s RFIs. These responses will be supplemented when the General Manager recovers, and after that, as required by PUC rules.

Respectfully submitted,

**MARY K. SAHS, P.C.**

*Mary K. Sahs*

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**ATTORNEY FOR DOBBIN PLANTERSVILLE  
WATER SUPPLY CORPORATION**

**CERTIFICATE OF SERVICE**

The undersigned hereby certifies that a copy of Respondent Dobbin Plantersville Water Supply Corporation's Response to Redbird Development, LLC's Request for Information was served on all parties of record in this proceeding on August 10, 2021, by filing on the Commission's Interchange Filing System.

*Mary K. Sahs*

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Mary K. Sahs

**RESPONSES TO REDBIRD'S REQUESTS FOR INFORMATION  
TO DOBBIN PLANTERSVILLE WATER SUPPLY CORPORATION**

**RFI 1.** Please provide the WSC's current budget for Fiscal Year 2021 and the budget applicable for Fiscal Year 2020.

**RESPONSE:** As agreed, a copy of the requested information was provided in response to SIG Magnolia's requests for information in Docket No. 51979 and also serves as the response to this request for information.

**PREPARED AND SPONSORED BY:** See response to RFI 1 in Docket No. 51979

**RFI 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.

**RESPONSE:** As agreed, a copy of the requested information was provided in response to SIG Magnolia's requests for information in Docket No. 51979 and also serves as the response to this request for information.

**PREPARED AND SPONSORED BY:** See response to RFI 2 in Docket No. 51979

**RFI 3.** Please provide Dobbin Plantersville's currently applicable capital improvement plan and most recently completed Master Plan.

**RESPONSE:** As agreed, a copy of the requested information was provided in response to SIG Magnolia's requests for information in Docket No. 51979 and also serves as the response to this request for information.

**PREPARED AND SPONSORED BY:** See response to RFI 3 in Docket No. 51979

**RFI 4 (as amended July 29).** Please list the groundwater conservation districts within which the WSC's CCN is located and provide the annual payments made to the groundwater district(s), and the associated groundwater volumes produced for Fiscal Years Ending in 2020, 2019, and 2018 and to-date Fiscal Year 2021.

**RESPONSE:** As agreed, a copy of the requested information was provided in response to SIG Magnolia's requests for information in Docket No. 51979 and also serves as the response to this request for information.

**PREPARED AND SPONSORED BY:** See response to RFI 4 in Docket No. 51979

**RFI 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.

**RESPONSE:** As agreed, a copy of the requested information was provided in response to SIG Magnolia's requests for information in Docket No. 51979 and also serves as the response to this request for information.

**PREPARED AND SPONSORED BY:** See response to RFI 5 in Docket No. 51979

**RFI 6.** Please provide copies of any contracts related to the purchase or sale of treated or raw water.

**RESPONSE:** None

**PREPARED AND SPONSORED BY:** Janie Legge, General Manager

**RFI 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.

**RESPONSE:** As agreed, a copy of the requested information was provided in response to SIG Magnolia's requests for information in Docket No. 51979 and also serves as the response to this request for information.

**PREPARED AND SPONSORED BY:** See response to RFI 7 in Docket No. 51979

**RFI 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.

**RESPONSE:** A copy of the requested map is attached as RFI 8 Exhibit.

**PREPARED AND SPONSORED BY:** Steve Duncan, P.E.

**RFI 9.** Please list all active connections within the area proposed for decertification by meter size.

**RESPONSE:** None

**PREPARED AND SPONSORED BY:** Janie Legge, General Manager

**RFI 10.** Please list all active connections on the WSC's system by meter size.

**RESPONSE:** As agreed, a copy of the requested information was provided in response to SIG Magnolia's requests for information in Docket No. 51979 and also serves as the response to this request for information.

**PREPARED AND SPONSORED BY:** See response to RFI 10 in Docket No. 51979

**RFI 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.

**RESPONSE:** None

**PREPARED AND SPONSORED BY:** Janie Legge, General Manager

**RFI 12 (as amended July 29).** Please list any fixed assets associated with the area proposed for decertification that would be rendered useless, or would be underutilized, as a result of the decertification.

**RESPONSE:** None

**PREPARED AND SPONSORED BY:** Janie Legge, General Manager

**RFI 13.** Please identify any assets in response to requests 10 or 11 that were grant funded or contributed by developers or customers.

**RESPONSE:** The active connections by meter size listed in response to RFI 10 were paid for by the respective customers. If a line extension was needed for a specific meter, that was paid for by the respective customer. No assets were grant funded or contributed by developers.

**PREPARED AND SPONSORED BY:** Janie Legge, General Manager

**RFI 14.** Please identify any portions of the assets in response to items 10 or 11 that were funded by debt that is still outstanding.

**RESPONSE:** None

**PREPARED AND SPONSORED BY:** Janie Legge, General Manager

**RFI 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.

**RESPONSE:** None

**PREPARED AND SPONSORED BY:** Steve Duncan, P.E.

**RFI 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.

**RESPONSE:** As the parties agreed on July 29, the legal and professional fees are summarized. As of July 31, the legal fees of Mary K. Sahs, P.C. associated with the decertification of Redbird are \$5,632.00 As of June 30, the professional fees of Bleyl Engineering are \$3,131.25.

**PREPARED AND SPONSORED BY:** Mary K. Sahs and Steve Duncan, P.E., respectively

**RFI 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.

**RESPONSE:** Dobbin Plantersville requires the developer to pay for all on-site and off-site infrastructure to provide water service, thus it is likely that there would be no cost to be incurred by the WSC to provide infrastructure and improvements to serve the area since Redbird will be providing that. Because the developer is responsible for the infrastructure, only Redbird can anticipate the timing required for installing said infrastructure.

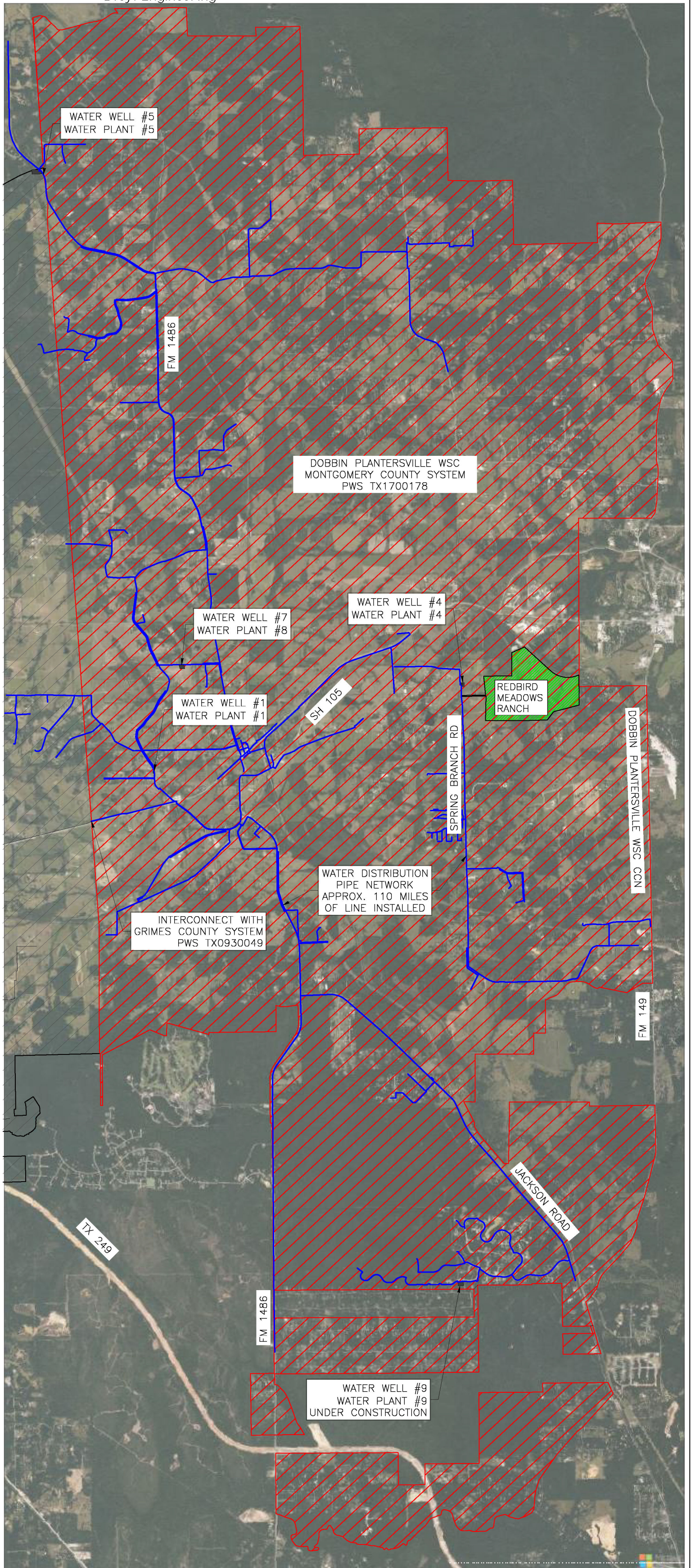
Additionally, Dobbin Plantersville is already providing 100% of the demand for water for the area sought to be decertified (and thus no additional cost at this time is needed). Although Redbird has expressed an intent to build houses, when the houses actually get built and sold to water consuming individuals, remains highly speculative and could be many years away or never occur.

**PREPARED AND SPONSORED BY:** Steve Duncan, P.E.

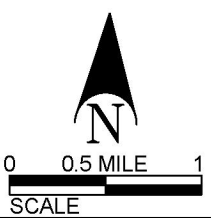


**RFI 8 - EXHIBIT**

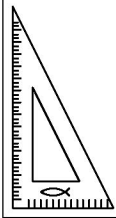




**DOBBIN PLANTERSVILLE WSC CCN MAP**



PROJECT NAME:	<b>REDBIRD MEADOWS RANCH</b>
PROJECT NUMBER:	<b>12875</b>
PREPARED FOR:	<b>DOBBIN PLANTERSVILLE WSC</b>
DATE:	<b>AUGUST 04, 2021</b>



**Bleyl Engineering**  
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