



## **Filing Receipt**

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**Control Number - 52310**

**Item Number - 141**

**SOAH DOCKET NO. 473-23-02390.WS  
PUC DOCKET NO. 52310**

<b>PETITION OF ROSE HILL SPECIAL</b>	<b>§</b>	<b>BEFORE THE STATE OFFICE</b>
<b>UTILITY DISTRICT FOR CEASE AND</b>	<b>§</b>	
<b>DESIST ORDER AGAINST THE CITY</b>	<b>§</b>	<b>OF</b>
<b>OF TERRELL FOR UNAUTHORIZED</b>	<b>§</b>	
<b>WATER SERVICE</b>	<b>§</b>	<b>ADMINISTRATIVE HEARINGS</b>

**COMMISSION STAFF'S SECOND REQUEST FOR INFORMATION TO  
ROSE HILL SPECIAL UTILITY DISTRICT  
QUESTION NOS. STAFF 2-1 THROUGH STAFF 2-2**

Pursuant to 16 Texas Administrative Code (TAC) § 22.144 of the Commission's Procedural Rules, the Staff (Staff) of the Public Utility Commission of Texas (Commission) requests that Rose Hill Special Utility District, by and through its representative of record, provide the following information and answer the following questions under oath. The questions shall be answered in sufficient detail to fully present all of the relevant facts, within the time limit provided by the Presiding Officer or within 20 days if the Presiding Officer has not provided a time limit. Please copy the question immediately above the answer to each question. These questions are continuing in nature, and if there is a relevant change in circumstances, submit an amended answer, under oath, as a supplement to your original answer. State the name of the witness in this cause who will sponsor the answer to the question and can vouch for the truth of the answer.

Provide responses to the Requests for Information by filing with the Commission solely through the Interchange on the Commission's website and provide notice, by email, to all other parties that the pleading or document has been filed with the Commission, unless otherwise ordered by the presiding officer pursuant to the Second Order Suspending Rules in Project No. 50664.

Dated: April 25, 2024

Respectfully submitted,

**PUBLIC UTILITY COMMISSION OF TEXAS  
LEGAL DIVISION**

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Division Director

John York Harrison  
Senior Managing Attorney

/s/ Glen Imes  
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**CERTIFICATE OF SERVICE**

I certify that unless otherwise ordered by the presiding officer, notice of the filing of this document will be provided to all parties of record via electronic mail on April 25, 2024, in accordance with the Second Order Suspending Rules, filed in Project No. 50664.

/s/ Glen Imes  
Glen Imes

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**DEFINITIONS**

- 1) "Rose Hill SUD" or "you" refers to Rose Hill Special Utility District and any person acting or purporting to act on their behalf, including without limitation, attorneys, agents, advisors, investigators, representatives, employees, or other persons.
- 2) "Document" includes any written, recorded, or graphic matter, however produced or reproduced, including but not limited to correspondence, telegrams, contracts, agreements, notes in any form, memoranda, diaries, voice recording tapes, microfilms, pictures, computer media, work papers, calendars, minutes of meetings or other writings or graphic matter, including copies containing marginal notes or variations of any of the foregoing, now or previously in your possession. In the event any documents requested by this Request for Information have been transferred beyond your control, describe the circumstances under which the document was destroyed or transferred and provide an exact citation to the subject document. In the event that documents containing the exact information do not exist, but documents do exist which contain portions of the required information or which contain substantially similar information, then the definition of "documents" shall include the documents which do exist, and these documents will be provided.

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**INSTRUCTIONS**

- 1) Pursuant to 16 TAC § 22.144(c)(2), Staff requests that answers to the requests for information be made under oath.
- 2) Please copy the question immediately above the answer to each question. State the name of the witness in this cause who will sponsor the answer to the question and can vouch for the truth of the answer.
- 3) These questions are continuing in nature, and if there is a relevant change in circumstances, submit an amended answer, under oath, as a supplement to your original answer.
- 4) Words used in the plural shall also be taken to mean and include the singular. Words used in the singular shall also be taken to mean and include the plural.
- 5) The present tense shall be construed to include the past tense, and the past tense shall be construed to include the present tense.
- 6) If any document is withheld under any claim of privilege, please furnish a list identifying each document for which a privilege is claimed, together with the following information: date, sender, recipients or copies, subject matter of the document, and the basis upon which such privilege is claimed.
- 7) Pursuant to 16 TAC § 22.144(h)(4), if the response to any request is voluminous, please provide a detailed index of the voluminous material.
- 8) Staff requests that each item of information be made available as it is completed, rather than upon completion of all information requested.

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Rosehill SUD must submit the following items:

- Staff 2-1** A detailed map showing the alleged encroachment(s) and interference(s) (as polygons, lines, and points, as appropriate) that are clearly labeled and shown in reference to verifiable man-made and natural landmarks, such as roads, rivers, and railroads. The detailed map must include a scale bar and provide the map in the original scale and Adobe PDF file format.
- Staff 2-2** Digital mapping data for each alleged encroachment(s) and interference(s) as identified on the detailed map shown in response to Staff 1-1, each provided as a single polygon, line and point record, in a shapefile (SHP) format, georeferenced in either NAD83 Texas Statewide Mapping System (Meters) or NAD83 Texas State Plane Coordinate System (US Feet).