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DOCKET NO. 52365

APPLICATION OF MEDINA	§	PUBLIC UTILITY COMMISSION
HIGHLANDS, INC. FOR AUTHORITY	§	
TO CHANGE RATES	§	OF TEXAS

**COMMISSION STAFF'S FIRST REQUEST FOR INFORMATION
TO MEDINA HIGHLANDS, INC.
QUESTION NOS. STAFF 1-1 THROUGH STAFF 1-2**

Pursuant to 16 Texas Administrative Code (TAC) § 22.144 of the Commission's Procedural Rules, the Staff of the Public Utility Commission of Texas (Staff) requests that Medina Highlands, Inc. by and through their attorney of record, provide the following information and answer the following question(s) under oath. The question(s) shall be answered in sufficient detail to fully present all 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 question(s) 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 Order Suspending Rules in Docket No. 50664.

Dated: August 31, 2021

Respectfully submitted,

**PUBLIC UTILITY COMMISSION OF TEXAS
LEGAL DIVISION**

Rachelle Nicolette Robles
Division Director

Rashmin J. Asher
Managing Attorney

/s/ Mildred Anaele
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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 via electronic mail on August 31, 2021, in accordance with the Order Suspending Rules, issued in Project No. 50664.

/s/ Mildred Anaele
Mildred Anaele

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**COMMISSION STAFF'S FIRST REQUEST FOR INFORMATION
TO MEDINA HIGHLANDS, INC.
QUESTION NOS. STAFF 1-1 THROUGH STAFF 1-2**

DEFINITIONS

- 1) "Medina Highlands," the "Company" or "you" refers to Medina Highlands, Inc. 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 the Company's 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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**COMMISSION STAFF'S FIRST REQUEST FOR INFORMATION
TO MEDINA HIGHLANDS, INC.
QUESTION NOS. STAFF 1-1 THROUGH STAFF 1-2**

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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**COMMISSION STAFF'S FIRST REQUEST FOR INFORMATION
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QUESTION NOS. STAFF 1-1 THROUGH STAFF 1-2**

Staff 1-1 Descriptions for all of the assets listed in the trending study were vague and supporting documentation was not provided with the study. Provide the following information for each of the assets listed in the trending study.

- A. For the assets listed as wells, such as "Well", provide the following for each well listed in the trending study:
 - 1. State of Texas Well Report (well driller's log) for each well.
 - 2. Cementation report.
 - 3. Engineering site plan (including appropriate scale and north direction arrow) of the public water system (PWS) that shows the well(s), wellhead, pump(s), treatment systems, storage and pressure tank(s), etc.
 - 4. Detailed map or plat (including appropriate scale and north direction arrow) identifying:
 - a. Property boundaries of property owned by the PWS.
 - b. Location of the PWS and well(s);
 - c. Intruder resistant fences and access roads;
 - d. Dedicated road easements, and
 - e. Pump Test.
 - f. Copy of property deed.
 - 5. Provide a copy of the Texas Commission on Environmental Quality (TCEQ) or predecessor agency approvals for all well construction, well use, fencing and access roads claimed in the trending study.
- B. For assets listed as storage tanks, such as "GST - 10,000 gal.", "GST - 6,000 gal" and "Float Switches", provide the following for all tanks listed in the trending study:

Tanks (pressure, ground and elevated):

 - 1. Any information on coating system particularly for the interior of the tank. Information about last paint contractor, pictures of leftover paint, and photos during painting.
 - 2. Particular information such as size, dimensions, materials of construction and documentation of construction.
 - 3. Labeled photographs of each tank's name plates, vents, openings, access panels, vent screens, ladders, handrails, and inside walls.
 - 4. Yearly inspection records for each tank (five year retention required by TCEQ rules. TCEQ rules also require "Each of the system's ground, elevated, and pressure tanks shall be inspected annually by water system personnel or a contracted inspection service".

5. Provide a copy of TCEQ or predecessor agency approvals for all tank construction claimed in the trending study.
- C. For the assets that are treatment equipment, such as “PST - 5,000 gal”, provide:
1. The capacity of each asset and a labeled photograph of each asset listed in the trending study.
 2. A copy of TCEQ or predecessor agency approvals for each asset’s construction or installation claimed in the trending study.
- D. For the assets listed as booster pumps, such as “Booster Pump”, provide:
1. The type and capacity of each pump and a labeled photograph of each pump listed in the trending study.
 2. A copy of TCEQ or predecessor agency approvals for all pump or lift station installations or construction claimed in the trending study.
- E. For the asset listed as fencing such as “Plant Fence – Chain Link”, provide:
1. Type, height, and length of each sides of fencing and a labeled photograph of each side listed in the trending study.
 2. Provide a copy of TCEQ or predecessor agency approvals for all fencing claimed in the trending study.
- F. For assets listed as distribution mains, such as “Dist. System 3" Dia. PVC”, “Dist. System 3" Dia. PVC”, “Dist. System R&M”, “Line Extension”, “Flush Valve - 15 Ea.”, etc., provide the following for each asset listed in the trending study:
Distribution or Collection Systems
1. Any distribution or collection maps available.
 2. Hydrant pressure and flushing records for distribution.
 3. Repair records, purchase orders and labeled photographs for pipes, valves, and appurtenances.
 4. Any subsurface utility engineering (SUE) records (such as potholing to determine pipe type).
 5. Operator interviews on type and condition of pipes.
 6. Provide a copy of TCEQ or predecessor agency approvals for all distribution or collection line construction claimed in the trending study.
- G. For all other assets listed in the trending study, provide the following information:
1. Provide a labeled photograph of each asset listed in the trending study.
 2. Any subsurface utility inspection records if applicable (such as potholing to determine pipe type).
 3. Operator interviews on type and condition of pipes.
 4. Provide a copy of TCEQ or predecessor agency approvals for each asset’s construction or installation claimed in the trending study.

Staff 1-2 An explanation and calculation and supporting documentation was not provided for the current and trended values of each asset listed in the trending study. Please

provide an explanation/calculation and supporting documentation such as bids or quotes obtained from non-affiliated entities to show how the current and trended values were determined for each asset listed in the trending study.