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DOCKET NO. 52440

APPLICATION OF CRYSTAL	§	PUBLIC UTILITY COMMISSION
SPRINGS WATER COMPANY, INC.	§	
TO AMEND ITS CERTIFICATES OF	§	OF TEXAS
CONVENIENCE AND NECESSITY	§	
IN MONTGOMERY COUNTY	§	

**COMMISSION STAFF'S THIRD REQUEST FOR INFORMATION
CRYSTAL SPRINGS WATER COMPANY, INC.
QUESTION NOS. STAFF 3-1 THROUGH 3-4**

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 Crystal Springs Water Company, Inc. by and through its representative 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 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 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: January 31, 2022

Respectfully submitted,

**PUBLIC UTILITY COMMISSION OF TEXAS
LEGAL DIVISION**

Rachelle Nicolette Robles
Division Director

Sneha Patel
Managing Attorney

/s/ Scott Miles
Scott Miles
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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 on January 31, 2022 in accordance with the Order Suspending Rules filed in Project No. 50664.

/s/ Scott Miles
Scott Miles

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**COMMISSION STAFF'S THIRD REQUEST FOR INFORMATION
CRYSTAL SPRINGS WATER COMPANY, INC.
QUESTION NOS. STAFF 3-1 THROUGH 3-4**

DEFINITIONS

- 1) "Crystal Springs," "Company" or "you" refers to Crystal Springs Water Company, 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 THIRD REQUEST FOR INFORMATION
CRYSTAL SPRINGS WATER COMPANY, INC.
QUESTION NOS. STAFF 3-1 THROUGH 3-4**

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 THIRD REQUEST FOR INFORMATION
CRYSTAL SPRINGS WATER COMPANY, INC.
QUESTION NOS. STAFF 3-1 THROUGH 3-4**

Staff 3-1 Please refer to the bank letter filed on January 17, 2022 and provide the following:

1. Admit or deny that the term loan and revolving line of credit covers the entire cost of \$8,465,000 for property and equipment (\$2,152,500 for water plant, \$1,312,500 for wastewater plant, \$1,250,000 for water distribution lines, and \$3,750,000 for sewage collection lines) provided in the 5 year projected balance sheet listed in Attachment H to the application on Bates Stamp page 147.
2. If the bank letter does not cover the entire cost referenced above, please indicate which costs are not covered and whether they will be paid for by the developers who have requested service. For example, if the water distribution lines cost and the sewage collection lines cost will be paid for by the developer(s), please provide the developer agreement(s) indicating the developer will pay for those costs, as well as the number of water and sewer connections per agreement.

Staff 3-2 Please refer to the 5 year projected balance sheet listed in Attachment H to the application on Bates Stamp page 147, as well as the response to Question 11 in the application on Bates Stamp pages 6-7 and provide the following:

1. Admit or deny that the estimated plant cost of the water and sewer system will contain the capacity to provide water and sewer service to the entire requested area.
2. Admit or deny that the water plant cost of \$2,152,500 includes the cost for all three water plants required to serve the requested area that are indicated on the response to Question 11.C.
3. If the water plant cost does not include all three water plants, please provide the projected costs and timeline for construction of Water Plants Nos. 2 and 3.

Staff 3-3 Please provide the number of connections and capacity planned for each phase of the build-out for each of the water plants.

For example, please see the table below:

	Phase I	Phase II	Phase III
Connection count	200	Phase I + 400	Phase II +.....
Well Capacity	350	Phase I + 250	
Storage Tank Capacity	100,000	Phase I + 50,000	
Pressure Tank Capacity	15,000	Phase I + 15,000	

Staff 3-4 Please provide a map showing the locations of each phase provided in response to Staff 3-3.