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DOCKET NO. 52493

COMPLAINT OF BRAD WHITE § PUBLIC UTILITY COMMISSION
AGAINST ARLEDGE RIDGE WATER §
SUPPLY CORPORATION § OF TEXAS

**ARLEDGE RIDGE WATER SUPPLY CORPORATION'S RESPONSES TO
COMMISSION STAFF'S FIRST REQUEST FOR INFORMATION,
QUESTION NOS. STAFF 1-1 THROUGH STAFF 1-11**

COMES NOW, Arledge Ridge Water Supply Corporation ("Arledge") and files this, its Responses to Commission Staff's First Request for Information, which was received on November 3, 2021. Pursuant to 16 Tex. Admin. Code § 22.144(c), a "party upon whom a request is served shall serve a full written response ... within 20 days after receipt of the request." Twenty days after November 3, 2021, is November 23, 2021; therefore, Arledge's responses are timely filed.

Respectfully submitted,

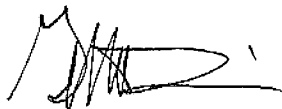


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**ATTORNEYS FOR ARLEDGE RIDGE
WATER SUPPLY CORPORATION**

CERTIFICATE OF SERVICE

I hereby certify that I have served or will serve a true and correct copy of the foregoing document via hand delivery, facsimile, electronic mail, overnight mail, U.S. mail and/or Certified Mail Return Receipt Requested to all parties on this the 23rd day of November, 2021.



Grayson E. McDaniel

DOCKET NO. 52493

**RESPONSE TO COMMISSION STAFF'S FIRST REQUEST FOR INFORMATION
QUESTION NOS. STAFF 1-1 THROUGH 1-11**

STAFF 1-1: Please provide a copy of Arledge Ridge WSC's distribution system map including the specific water line size and the existing connections for each line.

RESPONSE: Arledge will provide a responsive distribution system map upon the entry of a protective order.

Arledge reserves the right to supplement its response to this request.

Prepared by: Grayson E. McDaniel

Sponsored by: Alan McDonald, Jacob Dupuis.

STAFF 1-2: Please provide any violations received from the TCEQ requiring Arledge Ridge WSC to upgrade the 2 ½ inch water line that Arledge Ridge WSC intends to upgrade in order to provide service to Mr. White.

RESPONSE: Arledge has received no such violations; accordingly, no responsive documents exist.

Arledge reserves the right to supplement its response to this request.

Prepared by: Grayson E. McDaniel

Sponsored by: Alan McDonald

STAFF 1-3: Please identify all water lines in Arledge Ridge WSC's distribution system that are currently not in compliance with TCEQ rules.

RESPONSE: Arledge's does not have any non-compliant water lines; accordingly, no responsive documents exist.

Arledge reserves the right to supplement its response to this request.

Prepared by: Grayson E. McDaniel

Sponsored by: Alan McDonald

STAFF 1-4: Please provide a detailed description of the \$100,000 estimate provided to Mr. White for water service by breaking the alleged cost into sub-categories and fully explaining the costs of parts, labor, and equipment.

RESPONSE: Arledge did not prepare and does not possess a \$100,000 estimate for water service to Mr. White; accordingly, no responsive documents exist.

Arledge reserves the right to supplement its response to this request.

Prepared by: Grayson E. McDaniel

Sponsored by: Alan McDonald

STAFF 1-5: Please provide all engineering studies prepared in the last ten years recommending that the water lines in the area of Mr. White's residence be replaced or upgraded. For each study subject to this request, please include the name of the engineering firm that prepared the study.

RESPONSE: Arledge does not possess any engineering studies recommending that the water lines in the area of Mr. White's residence be replaced or upgraded; accordingly, no responsive documents exist.

Arledge reserves the right to supplement its response to this request.

Prepared by: Grayson E. McDaniel

Sponsored by: Alan McDonald

STAFF 1-6: Please provide a list of all of Arledge Ridge WSC's employees and indicate whether each employee receives a salary or is paid hourly wages.

RESPONSE: Arledge employs the following individuals:

- Michael Granstaff. Mr. Granstaff receives a salary.
- Penni Smallwood. Ms. Smallwood receives an hourly wage.
- Ronda Matherly. Ms. Matherly receives an hourly wage.

Arledge reserves the right to supplement its response to this request.

Prepared by: Grayson E. McDaniel

Sponsored by: Alan McDonald

STAFF 1-7: Please identify the employees of Arledge Ridge WSC that would be responsible for installing the 2 ½ inch water line that would provide water service to Mr. White's property.

RESPONSE: None. Arledge would hire a subcontractor to install the 2 ½ inch water line that would provide water service to Mr. White's property.

Arledge reserves the right to supplement its response to this request.

Prepared by: Grayson E. McDaniel

Sponsored by: Alan McDonald

STAFF 1-8: Please provide a detailed description of any capital improvement plans that include the replacement of the 2 ½ inch water line that Arledge Ridge intends to upgrade in order to serve Mr. White’s property.

RESPONSE: Arledge’s engineer, DBI/Dunaway, was authorized by Arledge’s Board of Directors in September 2021 to seek USDA financing estimated at \$1,364,210.98 to make improvements to Arledge’s system, construction costs of which are estimated as follows:

- Booster Pump Replacement: \$129,800.00;
- Pressure Tank Project: \$97,350.00
- State Highway 78 (FM 1553 North): \$394,890.54
- Strawn Road Elevated Tank: \$235,028.86
- State Highway 78 (CR 4815 Intersection): \$66,392.70
- State Highway 78 (FM 1553 – FM 1552): \$191,961.22
- CR 4730 (Standpipe – FM 896): \$84,370.00
- State Highway 78 (CR 4815 Intersection): \$164,417.66

Total: \$1,364,210.98

Arledge reserves the right to supplement this response.

Prepared by: Grayson E. McDaniel

Sponsored by: Alan McDonald, Jacob Dupuis

STAFF 1-9: Please provide a detailed explanation as to any funding applied for or secured for the above-mentioned capital improvement plan by Arledge Ridge.

RESPONSE: Arledge's engineer, DBI/Dunaway, was authorized by Arledge's Board of Directors in September 2021 to seek USDA financing estimated at \$1,364,210.98 to make improvements to Arledge's system described in response to RFI 1-8.

Arledge reserves the right to supplement its response to this request.

Prepared by: Grayson E. McDaniel

Sponsored by: Alan McDonald

STAFF 1-10: Please admit or deny that future customers will benefit from the upgrade of the 2 ½ inch water line. If admit, please explain how Arledge Ridge WSC plans to reimburse Mr. White for the future customer(s) share of the cost?

RESPONSE: Arledge cannot admit or deny the Request, as it is speculative whether any future customers will benefit from an upgrade of the 2 ½ inch water line. Arledge does not reimburse its existing customers for future customers' "share of the cost." Arledge owns and maintains improvements to its system.

Arledge reserves the right to supplement its response to this request.

Prepared by: Grayson E. McDaniel

Sponsored by: Alan McDonald

STAFF 1-11: Please indicate whether Arledge Ridge WSC has requested an exception to install additional connections on the 2 ½ inch water line along County Road 4264 from the TCEQ.

RESPONSE: Arledge has not made a request for an exception to TCEQ to install additional connections on the 2 ½ inch water line along County Road 4264. Arledge has not received an application for service from Complainant White. If Arledge does receive such an application, Arledge will submit it to DBI/Dunaway, Arledge's engineering firm, to assess whether additional connections can be made along County Road 4264.

Arledge reserves the right to supplement its response to this request.

Prepared by: Grayson E. McDaniel

Sponsored by: Alan McDonald