



## Filing Receipt

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**SOAH DOCKET NO. 473-22-1658.WS**  
**DOCKET NO. 52493**

<b>COMPLAINT OF BRAD WHITE</b>	<b>§</b>	<b>PUBLIC UTILITY COMMISSION</b>
<b>AGAINST ARLEDGE RIDGE WATER</b>	<b>§</b>	
<b>SUPPLY CORPORATION</b>	<b>§</b>	<b>OF TEXAS</b>

**COMMISSION STAFF'S FOURTH REQUEST FOR INFORMATION  
TO ARLEDGE RIDGE WATER SUPPLY CORPORATION  
QUESTION NOS. STAFF 4-1 THROUGH 4-4**

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 Arledge Ridge Water Supply Corporation and through its attorneys 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 10 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 Project No. 50664.

Dated: April 1, 2022

Respectfully submitted,

**PUBLIC UTILITY COMMISSION OF TEXAS  
LEGAL DIVISION**

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Division Director

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Managing Attorney

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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 April 1, 2022, in accordance with the Order Suspending Rules, issued in Project No. 50664.

/s/ Forrest Smith  
Forrest Smith

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**DEFINITIONS**

- 1) "Arledge Ridge WSC," or "you" refers to Arledge Ridge Water Supply Corporation 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 Cooperative, Inc.'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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**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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- Staff 4-1** In Arledge Ridge WSC's response to Staff's RFI 3-2, Arledge Ridge WSC provided a specific example of a "Standard Service" applicant in which a pipeline and/or service extension was not required for the applicant that resides at 655 CR 4715. Please provide any specific costs with a detailed description for parts, labor, and equipment necessary to provide water service to that address.
- Staff 4-2** If there are no construction labor and materials, inspection, administration, legal, and engineering fees associated with an applicant, but the existing pipeline that will provide service to the applicant is at capacity, is that still considered "Non-Standard" Service?
- Staff 4-3** Please provide a detailed list of any pipeline within Arledge Ridge WSC's service area that has reached its capacity limit.
- Staff 4-4** Please provide any planning reports as required by 30 Texas Administrative Code (TAC) §291.93(3) for any of Arledge Ridge WSC's water facilities that have reached 85% of its capacity.