



Filing Receipt

Received - 2022-04-12 12:05:00 PM
Control Number - 52493
ItemNumber - 39

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

COMPLAINT OF BRAD WHITE	§	STATE OFFICE OF
AGAINST ARLEDGE RIDGE WATER	§	
SUPPLY CORPORATION	§	ADMINISTRATIVE HEARINGS

**ARLEDGE RIDGE WATER SUPPLY CORPORATION'S
FIRST SUPPLEMENTAL RESPONSE TO COMMISSION STAFF'S
FOURTH REQUEST FOR INFORMATION, QUESTION NO. STAFF 4-3**

COMES NOW, Arledge Ridge Water Supply Corporation ("Arledge") and files this, its First Supplemental Response to Commission Staff's Fourth Request for Information, Question No. Staff 4-3. Relevant discovery procedures in the Texas Administrative Code place a party under a continuing duty to supplement its discovery response if that party acquires information that renders a response, though correct or complete when made, subsequently incorrect or incomplete. *See* 16 Tex. Admin. Code §22.144(i).

Respectfully submitted,

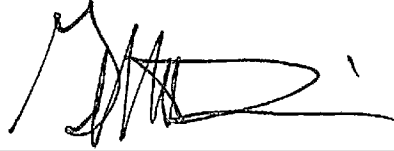


John J. Carlton
State Bar No. 03817600
Grayson E. McDaniel
State Bar No. 24078966
The Carlton Law Firm P.L.L.C.
4301 Westbank Drive, Suite B-130
Austin, Texas 78746
(512) 614-0901
Fax (512) 900-2855
john@carltonlawaustin.com
grayson@carltonlawaustin.com

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 12th day of April 2022.

A handwritten signature in black ink, appearing to read 'Grayson E. McDaniel', written over a horizontal line.

Grayson E. McDaniel

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

**ARLEDGE RIDGE WATER SUPPLY CORPORATION'S
FIRST SUPPLEMENTAL RESPONSE TO COMMISSION STAFF'S
FOURTH REQUEST FOR INFORMATION, QUESTION NO. STAFF 4-3**

STAFF 4-3: Please provide a detailed list of any pipeline within Arledge Ridge WSC's service area that has reached its capacity limit.

RESPONSE: The Texas Commission on Environmental Quality (TCEQ) promulgates rules regarding line capacity, including information regarding the maximum number of connections, based on waterline sizes. A 2-inch waterline is recommended to have no more than ten meters on it. Currently, the District's 2-inch waterline located on CR 4650 and CR 4640 has 12 meters on it. The District's engineer would not recommend additional meters be placed on that line without system improvements first being made.

In regard to 1.5-inch waterlines, TCEQ does not recommend them, and considers 2-inch waterlines as a required minimum size. The District has several 1.5-inch waterlines on the system that the District's engineer would not recommend that the District utilize unless system improvements were made.

SUPPLEMENTAL RESPONSE:

Attached hereto as "Exhibit A" is a detailed breakdown of the waterlines that Arledge Ridge WSC considers to be at capacity based on TCEQ parameters.

Prepared by: Grayson E. McDaniel

Sponsored by: Jacob Dupuis

EXHIBIT A

Waterlines at Max Connection Capacity	
Waterline Size	Location
1"	FM 1553, West of SH 78
1"	SH 78, North of CR 4264
1"	FM 68, intersection with CR 3115
1.5"	CR 4665, West from FM 896
1.5"	FM 896, South from CR 4665
1.5"	CR 4680, West from FM 896
1.5"	FM 896, North of CR 4710
1.5"	CR 4720, North from CR 4730
1.5"	CR 4725, West from FM 1553
1.5"	FM 1553, South from CR 4825
1.5"	CR 4800, East of FM 1553
1.5"	SH 78, Southwest of CR 4845
1.5"	SH 78, Southwest from CR 4815
1.5"	SH 78, Northeast from CR 4815
1.5"	CR 4805, East from CR 4815
1.5"	CR 4800, South from CR 4808
1.5"	CR 4808, West from CR 4815
1.5"	SH 11, West of intersection with CR 4808
1.5"	SH 11, West of intersection with CR 4808
1.5"	SH 11, South from FM 1553
1.5"	CR 4255, North from FM 1553
1.5"	CR 3715, East from FM 1552
1.5"	FM 68, East from SH 78
1.5"	CR 4245, North of CR 4250 to SH 78
1.5"	SH 78, North from CR 3105
1.5"	CR 3105, West of CR 3100
2"	CR 4668, North from CR 4665
2"	FM 896, South from CR 4730
2"	West of FM 896, cross country to CR 4640
2"	West of FM 896, cross country to CR 4675
2"	CR 4650, West from FM 896
2"	FM 896, North of CR 4710
2"	CR 4850, East from CR 4870 and South along CR 4851
2"	CR 4707, South from FM 1553
2"	CR 4244, North from FM 1553
2"	FM 1552, East from SH 78 to CR 3730 and CR 3710
2"	CR 3715, East of FM 1552
2.5"	FM 896, North of CR 4715
2.5"	SH 78, South of FM 1553 to FM 1552
2.5"	SH 78, North of CR 3115
3"	FM 896, South from CR 4730
3"	FM 896, North from CR 4675
3"	CR 4715, East from FM 896
3"	SH 78, South from FM 1553
3"	CR 4264, west from SH 78

3"	FM 1552, east from SH 78 to and along CR 3715
3"	FM 68, East from SH 78 and South on CR 3700
3"	SH 78, North of FM 68
4"	CR 4730, West from standpipe and north on FM 896
4"	SH 78, North from FM 1553