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DOCKET NO. 52493

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

**COMMISSION STAFF’S FIRST REQUEST FOR INFORMATION
TO ARLEDGE RIDGE SPECIAL UTILITY DISTRICT
QUESTION NOS. STAFF 1-1 THROUGH STAFF 1-11**

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 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 Project No. 50664.

Dated: November 3, 2021

Respectfully submitted,

**PUBLIC UTILITY COMMISSION OF TEXAS
LEGAL DIVISION**

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Division Director

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/s/ Forrest Smith
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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 November 3, 2021, 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 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.
- 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.
- Staff 1-3** Please identify all water lines in Arledge Ridge WSC's distribution system that are currently not in compliance with TCEQ rules.
- 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.
- 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.
- Staff 1-6** Please provide a list of all of Arledge Ridge WSC's employees and indicate whether each employee is receives a salary or is paid hourly wages.
- 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.
- 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
- 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 WSC.
- 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?
- 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.