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DOCKET NO. 52497

PETITION OF HC CELINA 414, LLC TO § PUBLIC UTILITY COMMISSION  
AMEND MARILEE SPECIAL UTILITY §  
DISTRICT'S CERTIFICATE OF § OF  
CONVENIENCE AND NECESSITY IN §  
COLLIN COUNT BY EXPEDITED RELEASE § TEXAS

**PETITIONER'S FIRST REQUESTS FOR INFORMATION TO  
MARILEE SPECIAL UTILITY DISTRICT  
PETITIONER'S QUESTIONS NOS. 1-1 THROUGH 1-18**

**TO THE PUBLIC UTILITY COMMISSION OF TEXAS:**

Pursuant to 16 Texas Administrative Code (TAC) § 22.144 of the Commission's Procedural Rules, HC Celina 414, LLC ("Petitioner") requests that the Marilee Special Utility District's ("Marilee"), 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 Project No. 50664.

Respectfully submitted,

**COATS ROSE, P.C**

By:



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**ATTORNEY FOR PETITIONER**

**CERTIFICATE OF SERVICE**

I certify that a true and correct copy of this document was served on the following attorney of record on or before May 9<sup>th</sup> 2022 in accordance with 16 TEX. ADMIN. CODE §22.74(c).

**Attorneys for Marilee Special Utility District:**

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Natalie B. Scott

PETITIONER'S FIRST REQUEST FOR INFORMATION  
TO MARILEE SPECIAL UTILITY DISTRICT  
QUESTION NOS. PETITIONER 1-1 THROUGH PETITIONER 1-18

DEFINITIONS

- 1) "Marilee SUD" or "the Company" refers to Marilee Special Utility District 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.
- 3) "Tract" is defined as the property for which the petitioner is seeking streamlined expedited release.

PETITIONER'S FIRST REQUEST FOR INFORMATION  
TO MARILEE SPECIAL UTILITY DISTRICT  
QUESTION NOS. PETITIONER 1-1 THROUGH PETITIONER 1-18

INSTRUCTIONS

- 1) Pursuant to 16 TAC § 22.144(c)(2), Petitioner 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) Petitioner 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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PETITIONER'S FIRST REQUEST FOR INFORMATION  
TO MARILEE SPECIAL UTILITY DISTRICT  
QUESTION NOS. PETITIONER 1-1 THROUGH PETITIONER 1-18

- PETITIONER 1-1: Please provide copies of the audited financial statements (Annual Reports) for Marilee SUD for the prior five (5) years.
- PETITIONER 1-2: Please provide a copy of the detailed revenue and expense budget for Marilee SUD for the current fiscal year.
- PETITIONER 1-3: Please provide the current 10-Year Capital Improvement Plan for Marilee SUD as well as detail for each of the projects identified in the plan including if it is for repairs and maintenance, growth related, etc.
- PETITIONER 1-4: Please provide a current map of the existing Marilee SUD facilities that includes a map of the existing water distribution system and location, size, and types of all storage facilities on Marilee SUD's system.
- PETITIONER 1-5: Please describe the type(s) of storage that Marilee SUD uses.
- PETITIONER 1-6: Please provide the current asset listing for Marilee SUD including description, original cost, and year in service. For treatment plant assets, please identify current treatment capacities for each asset/plant.
- PETITIONER 1-7: Please provide a detailed listing and valuation of all of the Marilee SUD's assets developed and currently existing for the express purpose of providing service to the parcel owned by HC Celina 414, LLC in Collin County, Texas, which is the subject of this Petition for Expedited Release.
- PETITIONER 1-8: Please provide information on any outstanding debt obligations of Marilee SUD including debt service schedules and uses of funds (i.e. asset maintenance, construction, design, etc.).
- PETITIONER 1-9: Does Marilee SUD have any agreements to purchase water from any other entity? If so, please provide all supporting contracts and other relevant documentation regarding these purchases, and please provide monthly purchases from each of these sources by month from January 2017 to the present.
- PETITIONER 1-10: Please provide any planning documents relative to the development and provision of treated and/or untreated water services developed for Marilee SUD within the last ten (10) years. This would include any master plans, growth plans, development plans, etc.
- PETITIONER 1-11: Please provide current growth projections for Marilee SUD including both customer projections and demand needs. Please provide projections for a minimum of five (5) years.

- PETITIONER 1-12: Please provide a current customer count as well as historical usage by year for the previous five (5) years. Please provide a breakdown by customer class, if available.
- PETITIONER 1-13: Please provide water billed revenues by identified customer class by month from January 2017 to present.
- PETITIONER 1-14: Please provide water consumption by identified customer class by month from January 2017 to the present.
- PETITIONER 1-15: Please provide water active accounts by identified customer class by month from January 2017 to the present.
- PETITIONER 1-16: Please provide total water produced and total water treated by plant for the previous five (5) years.
- PETITIONER 1-17: Please provide a copy of Marilee SUD 's current water rate schedule, and a schedule of all non-rate fees.
- PETITIONER 1-18: Does Marilee SUD have any other contractual agreements/obligations relative to the provision of water service? If yes, please provide copies of those agreements as well as current status of the agreement.