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PETITION BY MESQUOAKEE RANCH, LLC § BEFORE THE
FOR EXPEDITED RELEASE FROM §
WATER CCN NO. 10150 § PUBLIC UTILITY COMMISSION
HELD BY MARILEE SPECIAL UTILITY §
DISTRICT IN COLLIN COUNTY § OF TEXAS

**PETITIONER'S FIRST REQUESTS FOR INFORMATION TO
MARILEE SPECIAL UTILITY DISTRICT
PETITIONER'S QUESTIONS NOS. 1-1 THROUGH 1-10**

TO THE PUBLIC UTILITY COMMISSION OF TEXAS:

Pursuant to 16 Texas Administrative Code (TAC) § 22.144 of the Commission's Procedural Rules, Mesquoaakee Ranch, 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 June 13th, 2022 in accordance with 16 TEX. ADMIN. CODE §22.74(c).

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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 1-10

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 1-10

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.

PETITIONER'S FIRST REQUEST FOR INFORMATION
TO MARILEE SPECIAL UTILITY DISTRICT
QUESTION NOS. PETITIONER 1-1 THROUGH PETITIONER 1-10

- PETITIONER 1-1: Please provide copies of the audited financial statements (Annual Reports) for Marilee for the prior three (3) years.
- PETITIONER 1-2: Please provide a copy of the detailed revenue and expense budget for Marilee for the current fiscal year.
- PETITIONER 1-3: Please provide the current 10-Year Capital Improvement Plan for Marilee 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 the current asset listing for Marilee including description, original cost, and year in service. For treatment plant assets, please identify current treatment capacities for each asset/plant.
- PETITIONER 1-5: Please provide a detailed listing and valuation of all of the Marilee's assets developed and currently existing for the express purpose of providing service to the parcel owned by Mesquoakee Ranch LLC, in Collin County, Texas, which is the subject of this Petition for Expedited Release.
- PETITIONER 1-6: Please provide information on any outstanding debt obligations of Marilee including debt service schedules and uses of funds (i.e. asset maintenance, construction, design, etc.).
- PETITIONER 1-7: Please provide current growth projections for Marilee including both customer projections and demand needs. Please provide projections for a minimum of five (5) years.
- PETITIONER 1-8: Please provide all data, reports and/or analyses in Marilee's possession that document or forecast any and all future growth and demand in the parcel owned by Mesquoakee Ranch LLC In Collin County, Texas, which is the subject of this Petition for Expedited Release.
- PETITIONER 1-9: Please provide water billed revenues, active accounts and water consumption by identified customer class by month from January 2019 to present.
- PETITIONER 1-10: Please provide a copy of Marilee's current water rate schedule, and a schedule of all non-rate fees.