



## Filing Receipt

**Received - 2022-08-04 09:05:55 AM**  
**Control Number - 52653**  
**ItemNumber - 26**

PETITION BY ELAND ENERGY, INC.	§	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 SUBMISSION OF APPRAISAL REPORT**

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

In accordance with the Final Order and Order No. 4, Eland Energy, Inc. ("Petitioner") submits its appraisal report in support of its contention the Marilee Special Utility District is not entitled to compensation in this docket.

Respectfully submitted,

**COATS ROSE, P.C**

By: 

Natalie B. Scott  
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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 August 4<sup>th</sup> 2022 in accordance with 16 TEX. ADMIN. CODE §22.74(c).

**Attorney for Marilee Special Utility District:**

John J. Carlton  
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Austin, Texas 78711-3326  
Email: [kourtnee.jinks@puc.texas.gov](mailto:kourtnee.jinks@puc.texas.gov)



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Natalie B. Scott



August 1, 2022

Ms. Natalie B. Scott, Attorney  
COATS ROSE, P.C.  
2700 Via Fortuna, Suite 350  
Austin, Texas 78748

**Re: Compensation Determination for Area Subject to Petition Eland Energy, Inc. to Amend Marilee Special Utility District's Certificate of Convenience and Necessity in Collin County by Expedited Release (PUC Docket No. 52653)**

Dear Ms. Scott,

On behalf of Willdan Financial Services ("Willdan"), my staff and I have completed our valuation of the decertified 33.23-acre tract (the "Property" or "Decertified Area") that is the subject of a petition set forth by Eland Energy, Inc. ("Eland") for Streamlined Expedited Release from Marilee Special Utility District ("Marilee") Water CCN No. 10150. This Property is located in Collin County and is identified in Texas Public Utility Commission Docket No. 52653. The petition was approved via the issuance of an Order dated May 26, 2022, and included in this summary valuation as **Appendix A**.

Specifically, Ordering Paragraph Number 7 states that "the amount of compensation to be awarded to the CCN holder, if any, commences with the filing of this Order in accordance with the schedule adopted in Order No. 4. Any decision on compensation will be made by a separate order." The purpose of this summary letter is to provide our opinion on the amount of compensation, if any, owed to the prior certificate holder, Marilee, as a result of the streamlined expedited release of the Property in accordance with applicable laws and statutes.

Based on this valuation, the recommended just and adequate compensation that Marilee should receive for the decertification of the Property from its CCN service area should be \$0 (other than necessary and reasonable legal expenses and professional fees, if any), as discussed in detail in the remainder of this Letter Report.

### **Governing Statutes and Rules**

The Petition in this proceeding was filed in accordance with Texas Water Code (TWC) §13.2541 and 16 Texas Administrative Code (TAC) § 24.245(h). TWC §13.2541 provides for the following relative to the valuation to be conducted as part of this proceeding:

- (f) The utility commission may require an award of compensation by the petitioner to the certificate holder in the manner provided by this section, and
- (h) Section 13.254(g) applies to a determination of the monetary amount of compensation under this section.

In reference to TWC §13.254(g) and 16 TAC § 24.245(j), the factors ensuring that the compensation to a retail public utility is just and adequate shall include:

- (1). Specific to real property, the value of real property owned and utilized by the retail public utility for its facilities determined in accordance with the standards set forth in Chapter 21, Property Code, governing actions in eminent domain.
- (2). Specific to personal property, the factors ensuring that the compensation to a retail public utility is just and adequate shall include:
  - (A) The amount of the former CCN holder's debt allocable to service to the removed area;
  - (B) The value of the service facilities belonging to the former CCN holder that are located within the removed area;
  - (C) The amount of any expenditures for planning, design, or construction of the service facilities of the former CCN holder that are allocable to service to the removed area;
  - (D) The amount of the former CCN holder's contractual obligations allocable to the removed area;
  - (E) Any demonstrated impairment of service or any increase of cost to consumers of the former CCN holder remaining after a CCN revocation or amendment under 16 TAC § 24.245;
  - (F) The impact on future revenues lost from existing customers;
  - (G) Necessary and reasonable legal expenses and professional fees, including costs incurred to comply with TWC §13.257(r); and
  - (H) Any other relevant factors as determined by the Commission.

### Documents Reviewed

Documents that Willdan reviewed in conducting this valuation analysis, include, but are not limited to the following:

- Texas Water Code Section 13.2541, Section 13.254, and others
- Texas Administrative Code Section 24.245



- Filings with the Public Utility Commission of Texas in Docket No. 52653
- The Original Petition filed by Eland Energy, Inc. to Amend Marilee’s Water Certificate of Convenience and Necessity in Collin County by Expedited Release
- Order Approving Expedited Release in PUC Docket No. 52653 (included as **Appendix A**)
- 2021 Region C Water Plan Dated November 2020: Prepared for The Region C Water Planning Group, which includes extensive data on forecast and expected growth in Denton’s service territory

It should be noted that we solicited specific documents through a Request for Information from Marilee to support or document any valuation calculations, but Marilee did not respond to our request.

## Background

On September 28, 2021, Eland Energy, Inc. filed a petition for streamlined expedited release of property in Collin County from the service area under water certificate of convenience and necessity (CCN) number 10150. Marilee Special Utility District was identified as the holder of CCN number 10150. Eland owns approximately 49.07 acres of land within Collin County, Texas in three non-contiguous tracts. In the petition, Eland requested that the Property in one of the three tracts (approximately 33.23 acres) be released from Marilee’s CCN. On May 26, 2022, the Commission issued an Order releasing the tract of land identified in the petition from the Marilee’s service area under CCN number 10150.

As of today, the property is vacant, and has no existing development. Further, as noted in the PUC’s Decertification Order, “the CCN holder has no facilities or lines that provide water service to the tract of land.”

## Analysis of Valuation Criteria

In this section we evaluate each of the factors outlined in TWC §13.254(g) and 16 TAC § 24.245(j) for the purposes of assessing a valuation of the decertified CCN. I will first state the criteria and then provide my analysis and conclusions regarding an appropriate valuation.

### 1. **The value of real property owned and utilized by the retail public utility for its facilities.**

Findings:

Specific to the expedited release, the certificated area is being released from Marilee’s water CCN. However, no real property is changing hands as a result of the decertification. Further, according to Findings of Fact Nos. 19, 20, 21, 22, 23, 24, and 25 in **Appendix A**:

“The tract of land is not receiving actual water service from the CCN holder.”



“The petitioner has not requested that the CCN holder provide water service to the tract of land.”

“The petitioner has not paid any charges or fees to the CCN holder to initiate or maintain water service for the tract of land, and there are no billing records or other documents indicating an existing account for the tract of land.”

“The CCN holder owns and operates water system infrastructure located outside of, but in proximity to, the tract of land. None of this infrastructure provides water service to the tract of land.”

“The CCN holder has not committed or dedicated any facilities or lines to the tract of land for water service.”

“The CCN holder has no facilities or lines that provide water service to the tract of land.”

“The CCN holder has not performed any acts for or supplied anything to the tract of land.”

In summary, there are no facilities in the area to be decertified, nor to the best of my knowledge based on review of available documents has Marilee performed acts or supplied any service to the subject area. There is no real property that is owned and utilized by Marilee (“retail public facility”) for its facilities within the subject area.

This lack of documentation of specific accounts or forecast growth in the CCN area leads to the reasonable conclusion that no growth or development would be expected in the CCN area in the foreseeable future if Marilee were to continue to possess the CCN.

Therefore, as there is no real property being transferred nor rendered useless or permanently under-utilized as a result of this expedited release, it is my opinion that the value for **Factor 1** is \$0.00 associated with real property owned and utilized by the retail public utility.

**2A. The amount of the retail public utility's debt allocable for service to the removed area.**

Findings:

Similar to Item No. 1 above, Marilee has no facilities and/or customers within the subject area, nor has Marilee performed acts or supplied any service to the subject area. While Marilee may have outstanding debt, no detailed information regarding the specific projects and improvements that were funded through existing outstanding debt service, if any has been provided by Marilee in response to our request.

Marilee has not provided any specific documentation in response to our request, regarding forecast growth in the CCN area, and has therefore failed to prove that any of their general investment in system assets (or any debt used to fund such investment) was for the purpose of serving anticipated growth in the CCN area. Further, it is our understanding that the holder of the property does not intend to develop the property in the foreseeable future if Marilee were to continue to possess the CCN. The combination



of the lack of documentation of specific accounts or forecast growth in the CCN area, and the intention of the owner not to develop if Marilee possesses the CCN, leads to the reasonable conclusion that **no growth or development would be expected in the CCN area in the foreseeable future if Marilee were to continue to possess the CCN.**

Therefore, any attempt to “allocate” any existing Marilee debt service to non-existent “future customers” based on a hypothetical calculation of future growth in the CCN area would be unreasonable, excessively speculative and invalid. Marilee has presented no evidence to support the contention that any of their system investment is specifically for the CCN area, and not for general maintenance, replacement or growth in other areas of Marilee’s CCN. It would be inappropriate to compensate Marilee in real dollars based on hypothetical allocations, unproven growth estimates, and “future customers” who do not exist and are not guaranteed to ever exist.

It is also important to note that the owner of the property intends to develop the property only if the CCN is removed from Marilee and will not develop the property if Marilee maintains possession of the CCN. Therefore Marilee should not be compensated for future development of the property that will only occur if Marilee is not the holder of the CCN or the provider of services.

Finally, in Section 2H, I outline evidence from the 2021 Region C Water Plan Dated November 2020 that refutes any argument that capacity in Marilee’s existing system including water supply purchases and distribution facilities would be “stranded” or lose value due to the decertification of this portion of the CCN. This evidence, along with the documentation stated above showing that there is not expected to be any development in the CCN area if Marilee continues to possess the CCN, undermines any argument that any of Marilee’s existing developed capacity is for the purpose of serving the CCN area. Further, even if this were the case, Marilee could use this capacity to service its expected growth in other areas. Therefore, the investment could not be considered stranded, or dedicated to the CCN area, nor should Marilee be entitled to compensation for this investment.

Therefore, it is my opinion that \$0.00 in Marilee’s current debt is allocable to this area for Factor 2A.

**2B. The value of the service facilities of the retail public utility located within the removed area.**

Findings:

The Findings of Fact cited above state conclusively that Marilee does not maintain service facilities on the subject area. Therefore, it is my opinion that there is \$0.00 value to be assigned to **Factor 2B.**





**2C. The amount of any expenditures for planning, design, or construction of the service facilities that are allocable to service to the removed area.**

Findings:

As Marilee did not provide any documentation to the contrary, it is assumed that additional investment and additional action would be necessary to provide and expand the utility's service to the subject area.

Therefore, based on documentation provided and reviewed as part of the filings in Docket No. 52653, and to the best of my knowledge, I have seen no evidence that expenditures associated with the planning, design, or construction of service facilities can be allocable to the area to be decertified. As a result, I have assigned a \$0.00 value to **Factor 2C**.

**2D. The amount of contractual obligations allocable to the removed area.**

Findings:

As previously stated in the Findings of Fact, Marilee does not have any existing customers or infrastructure located within the subject area.

Therefore, it is unreasonable to allocate any existing contractual obligations to the removed area. As a result, my opinion of value for **Factor 2D** is \$0.00.

**2E. Any demonstrated impairment of service or any increase of cost to consumers remaining after the decertification.**

Findings:

There are no current customers or facilities within the subject area, and the evidence in **Factor 1** leads to the reasonable conclusion that no growth or development would be expected in the CCN area for the foreseeable future if Marilee were to continue to possess the CCN.

Therefore, it is my opinion that there is no evidence of impairment of services and/or increase in costs to the remaining customers of Marilee as a result of decertification. No current customers contribute to fixed cost recovery currently from the subject area, and there is no reasonable expectation of future development that will lead to future customers contributing to fixed cost recovery. As a result, my opinion of value for **Factor 2E** is \$0.00.



**2F. The impact on future revenues lost from existing customers.**

Findings:

As previously stated, there are no existing customers within the subject area as specifically stated in the Findings of Fact. Therefore, there is no loss of future revenues from existing customers in the area. Given this, my opinion of value for **Factor 2F** is \$0.00.

**2G. Necessary and reasonable legal expenses and professional fees.**

Findings:

Marilee is entitled to recovery of any necessary and reasonable legal expenses related to its participation in Docket No. 52653, along with professional fees incurred in preparing its determination of compensation. (Note: **per the Texas Water Code, the cost of Marilee's Independent Appraisal cannot be included in Factor 2G**).

At this time, I do not have any information regarding any legal expenses or professional fees incurred by Marilee. I recommend that the Commission order Marilee to produce invoice documentation in support of any requested legal expenses and professional fees, as well as specific justification for the reasonableness of such expenses. Based on that evidence provided by Marilee, the Commission should make a determination as to whether Marilee is entitled to reimbursement for legal and professional expenses, and if so, the total amount of such reimbursement.

**2H. Any other relevant factors.**

Findings:

As indicated in Docket No. 52653, there are currently no assets located within the area to be decertified. Marilee would incur additional capital cost to provide service to the subject area.

Marilee is located in northeastern Collin County and southeastern Grayson County and gets its water supplies from treated water purchased from Sherman and from the Trinity aquifer. As shown in the 2021 Region C Water Plan Dated November 2020 and prepared for The Region C Water Planning Group, Section 5E, pages 275-276, based on current projections, the Total Projected Demands for Sherman (including current, future direct customers, and GTUA Regional Water System Customers) will exceed its currently available supply by 16,869 ac-ft/year by 2030 within the region. According to the Water Plan, "Water management strategies for Marilee include conservation and additional water from Sherman through the GTUA Regional Water System."

This refutes any argument that capacity in Marilee's existing system including water supply purchases and distribution facilities would be "stranded" or lose value due to the decertification of this portion of the CCN. First, the evidence in **Factor 1** leads to the



reasonable conclusion that no growth or development would be expected in the CCN area for the foreseeable future if Marilee were to continue to possess the CCN. This undermines any argument that any of Marilee's existing capacity is for the purpose of serving the CCN area. Second, even if this were the case, Marilee could use this capacity to service its expected growth in other areas. Therefore, the investment could not be considered stranded, or dedicated to the CCN area, nor should Marilee be entitled to compensation for this investment.

Selected pages from the Water Plan are included as **Appendix B**.

Further, I have researched other transactions involving parcels that have been decertified from both water and sewer CCNs. A summary of the transactions is included in **Appendix C**. These transactions date from 2015 through present. The majority of the transactions identified were for decertified parcels that were similar to the circumstances identified in the Eland petition and Order Findings of Fact for PUC Docket No. 52653. Many of the transactions involved one or more appraisals as shown on **Schedule 1**. Additionally, a some of the transactions did not involve an appraisal as a settlement was reached between the two parties before the appraisal process was begun, as identified on **Schedule 2**. As shown on **Schedule 1** and **Schedule 2**, other than an allowance for "necessary and reasonable legal expenses and professional fees" the vast majority of the transactions identified resulted in a PUC Order of no compensation due.

I am unaware of any other relevant factors to be considered within this proceeding which would merit further analysis for determining just and adequate compensation.

## Conclusion

Based upon my analysis, as governed by TWC §13.254(g), and on the Commission's Findings of Fact noted above, it is my opinion that the compensation determination for the area subject to the Landowner's application for Expedited Decertification is zero dollars (\$0.00), with the exception that Marilee should be allowed to recover necessary and reasonable legal and professional fees as approved by the Commission.

We appreciate this opportunity to assist you in this matter. If you have any questions, please do not hesitate to contact me at 972.378.6588 or [djackson@willdan.com](mailto:djackson@willdan.com).

Respectfully submitted,

### WILLDAN FINANCIAL SERVICES



**Dan V. Jackson**  
**Vice President**



### **List of Appendices**

- Appendix A – Order Approving Expedited Release in PUC Docket No. 52653
- Appendix B – 2021 Region C Water Plan Dated November 2020 (Selected Pages)
- Appendix C – Selected Decertified Parcel Analysis – Texas Public Utility Commission Dockets
- Appendix D – Resume of Dan V. Jackson, MBA



# Appendices

# Appendix A



Control Number: 52653



Item Number: 19

PETITION OF ELAND ENERGY, INC. §  
TO AMEND MARILEE SPECIAL §  
UTILITY DISTRICT'S CERTIFICATE §  
OF CONVENIENCE AND NECESSITY §  
IN COLLIN COUNTY BY EXPEDITED §  
RELEASE §

PUBLIC UTILITY COMMISSION  
OF TEXAS

**ORDER**

This Order addresses the petition by Eland Energy, Inc. for streamlined expedited release of a tract of land in Collin County from Marilee Special Utility District's service area under certificate of convenience and necessity (CCN) number 10150. For the reasons stated in this Order, the Commission releases the tract of land from Marilee's certificated service area. In addition, the Commission amends Marilee's CCN number 10150 to reflect the removal of this tract of land from the service area.

Following entry of this Order, the Commission will determine the amount of compensation, if any, to be awarded to Marilee, which will be addressed by separate order.

**I. Findings of Fact**

The Commission makes the following findings of fact.

**Petitioner**

1. Eland Energy is a Texas corporation that was registered with the Texas secretary of state under filing number 70828300.

**CCN Holder**

2. Marilee is a special utility district operating under chapter 65 of the Texas Water Code (TWC).
3. Marilee holds CCN number 10150 that obligates it to provide retail water service in its certificated service area in Collin County.

**Petition and Supplemental Filings**

4. On September 28, 2021, the petitioner filed a petition for streamlined expedited release of a tract of land from the CCN holder's service area under CCN number 10150.



5. The petition includes an affidavit, dated September 27, 2021, of Gregg Allen, president of the petitioner; maps; a metes-and-bounds description of the tract of land; a deed dated October 1, 2014; digital mapping data; and a final judgement.
6. On November 9, 2021, the petitioner filed supplemental information, which included a location map, a detailed map, a metes-and-bounds description of the tract of land for which release is sought, and digital mapping data.
7. In Order No. 4 filed on December 13, 2021, the administrative law judge (ALJ) found the petition administratively complete.

**Notice**

8. The petitioner sent a copy of the petition by certified mail, return receipt requested, to the CCN holder on September 28, 2021.
9. In Order No. 4 filed on December 13, 2021, the ALJ found the notice sufficient.

**Intervention and Response to the Petition**

10. In Order No. 2 filed on October 25, 2021, the ALJ granted the CCN holder's motion to intervene.
11. On January 3, 2022, Marilee filed a response to the petition, which includes an affidavit, dated January 3, 2022, of Donna Loiselle, the CCN holder's general manager; an April 13, 2021 commitment letter committing to provide the CCN holder a loan through the United States Department of Agriculture Water and Environmental Guaranteed Loan Program; a United States Department of Agriculture letter dated July 19, 2021 approving the loan; a voting proposition from the CCN holder dated November 2, 2021; a summary results report of general and special elections held by the CCN holder on November 2, 2021, dated November 8, 2021; an affidavit, dated January 3, 2022, of Eddy Daniel, the CCN holder's engineer of record; maps identifying the tract of land and the CCN holders' waterlines, meters, and wells in relation thereto; an affidavit, dated December 28, 2021, of Chris Boyd, general manager of Mustang Special Utility District regarding the release; an active contests options list dated November 2, 2021 for Mustang SUD; and a cumulative results report for a Mustang SUD election held on November 2, 2021, dated November 9, 2021.

**The Tract of Land**

12. The petitioner owns property in Collin County that is approximately 49.07 acres.
13. The petitioner's property consists of three non-contiguous portions: an approximately 1.24-acre portion, an approximately 14.6-acre portion; and an approximately 33.23-acre portion.
14. The tract of land for which the petitioner seeks streamlined expedited release is the portion of the petitioner's property that is approximately 33.23 acres.
15. The tract of land is located within the CCN holder's certificated service area.

**Ownership of the Tract of Land**

16. The petitioner acquired the tract of land by a deed dated October 1, 2014.

**Qualifying County**

17. Collin County has a population of more than 47,500 and is adjacent to Dallas County.
18. Dallas County has a population of at least one million.

**Water Service**

19. The tract of land is not receiving actual water service from the CCN holder.
20. The petitioner has not requested that the CCN holder provide water service to the tract of land.
21. The petitioner has not paid any charges or fees to the CCN holder to initiate or maintain water service for the tract of land, and there are no billing records or other documents indicating an existing account for the tract of land.
22. The CCN holder owns and operates water system infrastructure located outside of, but in proximity to, the tract of land. None of this infrastructure provides water service to the tract of land.
23. The CCN holder has not committed or dedicated any facilities or lines to the tract of land for water service.
24. The CCN holder has no facilities or lines that provide water service to the tract of land.
25. The CCN holder has not performed any acts for, or supplied anything to, the tract of land.

Map and Certificate

26. On February 3, 2022, Commission Staff filed a supplement to its recommendation on final disposition, which included a certificate and a map on which it identified the tract of land in relationship to the CCN holder's certificated service area.

**II. Conclusions of Law**

The Commission makes the following conclusions of law.

1. The Commission has authority over this petition for streamlined expedited release under TWC §§ 13.254 and 13.2541.
2. The petitioner provided notice of the petition in compliance with 16 Texas Administrative Code (TAC) § 24.245(h)(3)(F).
3. No opportunity for a hearing on a petition for streamlined expedited release is provided under TWC §§ 13.254 or 13.2541 and, under 16 TAC § 24.245(h)(7), no hearing will be held on such a petition.
4. Petitions for streamlined expedited release filed under TWC §§ 13.254 or 13.2541 and 16 TAC § 24.245(h)(7) are not contested cases.
5. Landowners seeking streamlined expedited release under TWC §§ 13.254 and 13.2541 and 16 TAC § 24.245(h) are required to submit a verified petition through a notarized affidavit, and the CCN holder may submit a response to the petition.
6. Under 16 TAC § 24.245(h)(7), the Commission's decision is based on the information submitted by the landowner, the CCN holder, and Commission Staff.
7. To obtain release under TWC § 13.2541(b), a landowner must demonstrate that the landowner owns a tract of land that is at least 25 acres, that the tract of land is located in a qualifying county, and that the tract of land is not receiving service of the type that the current CCN holder is authorized to provide under the applicable CCN.
8. The time that the petition is filed is the only relevant time period to consider when evaluating whether a tract of land is receiving water service under TWC § 13.2541(b). Whether a tract of land might have previously received water or sewer service is irrelevant.
9. A landowner is not required to seek the streamlined expedited release of all of its property.

10. The petitioner owns the tract of land that is at least 25 acres for which it seeks streamlined expedited release.
11. Collin County is a qualifying county under TWC § 13.2541(b) and 16 TAC § 24.245(h)(2).
12. The tract of land is not receiving water service under TWC §§ 13.002(21) and 13.2541(b) and 16 TAC § 24.245(h), as interpreted in *Texas General Land Office v. Crystal Clear Water Supply Corporation*, 449 S.W.3d 130 (Tex. App.—Austin 2014, pet. denied).
13. The petitioner is entitled under TWC § 13.2541(b) to the release of the tract of land from the CCN holder's certificated service area.
14. After the date of this Order, the CCN holder has no obligation under TWC § 13.254(h) to provide retail water service to the tract of land.
15. The Commission may release only the property of the landowner from a CCN under TWC § 13.2541(b). The Commission has no authority to decertify any facilities or equipment owned and operated by the CCN holder to provide retail water service through the streamlined-expedited-release process under TWC § 13.2541(b).
16. The Commission processed the petition in accordance with the TWC and Commission rules.
17. Under TWC § 13.257(r) and (s), the CCN holder is required to record certified copies of the approved certificate and map, along with a boundary description of the service area, in the real property records of Collin County no later than the 31st day after the date the CCN holder receives this Order.
18. A retail public utility may not under TWC § 13.254(d) provide retail water service to the public within the tract of land unless just and adequate compensation under TWC § 13.254(g) has been paid to the CCN holder.

### III. Ordering Paragraphs

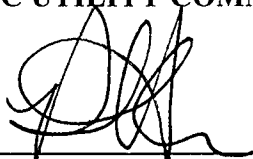
In accordance with these findings of fact and conclusions of law, the Commission issues the following orders.

1. The Commission releases the tract of land identified in the petition from the CCN holder's certificated service area under CCN number 10150.

2. The Commission does not decertificate any of the CCN holder's equipment or facilities that may lay on or under the tract of land.
3. The Commission amends CCN number 10150 in accordance with this Order.
4. The Commission approves the map attached to this Order.
5. The Commission issues the certificate attached to this Order.
6. The CCN holder must file in this docket proof of the recording required in TWC § 13.257(r) and (s) within 45 days of the date of this Order.
7. The proceeding to determine the amount of compensation to be awarded to the CCN holder, if any, commences on the date of this Order in accordance with the schedule adopted in Order No. 4. Any decision on compensation will be made by a separate order.
8. The Commission denies all other motions and any other requests for general or specific relief not expressly granted by this Order.

Signed at Austin, Texas the 26<sup>th</sup> day of May 2022.

**PUBLIC UTILITY COMMISSION OF TEXAS**



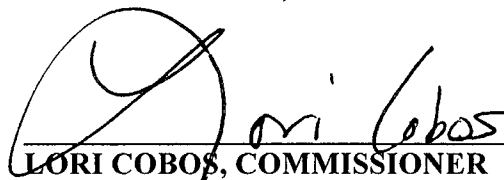
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**PETER M. LAKE, CHAIRMAN**



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**WILL MCADAMS, COMMISSIONER**



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**LORI COBOS, COMMISSIONER**



# **Public Utility Commission of Texas**

**By These Presents Be It Known To All That**

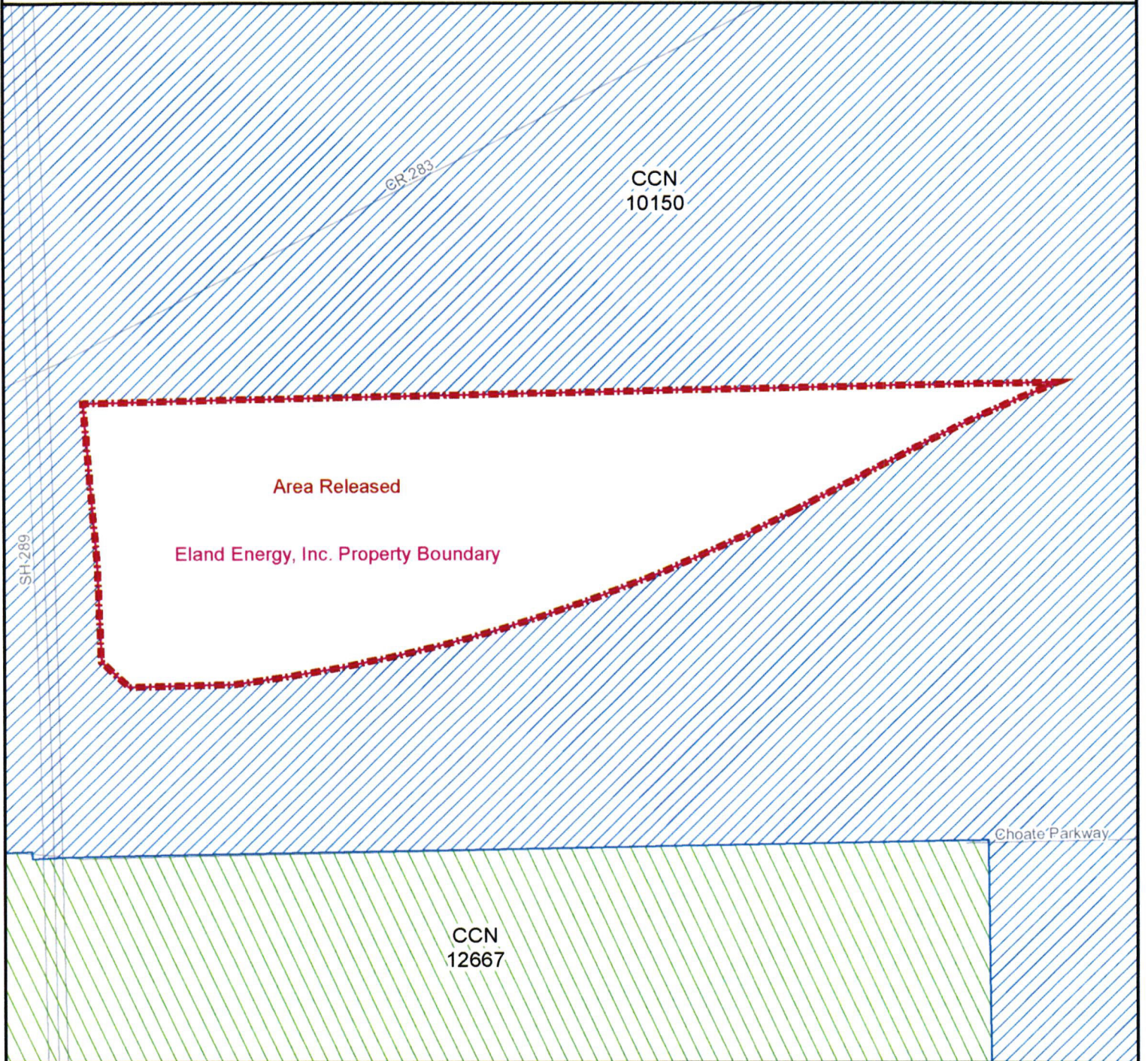
## **Marilee Special Utility District**

having obtained certification to provide water utility service for the convenience and necessity of the public, and it having been determined by this Commission that the public convenience and necessity would in fact be advanced by the provision of such service, Marilee Special Utility District is entitled to this

### **Certificate of Convenience and Necessity No. 10150**



to provide continuous and adequate water utility service to that service area or those service areas in Collin and Grayson Counties as by final Order or Orders duly entered by this Commission, which Order or Orders resulting from Docket No. 52653 are on file at the Commission offices in Austin, Texas, and are matters of official record available for public inspection; and be it known further that these presents do evidence the authority and the duty of the Marilee Special Utility District to provide such utility service in accordance with the laws of this State and Rules of this Commission, subject only to any power and responsibility of this Commission to revoke or amend this Certificate in whole or in part upon a subsequent showing that the public convenience and necessity would be better served thereby.

Marilee Special Utility District  
Portion of Water CCN No. 10150  
PUC Docket No. 52653  
Petition by Eland Energy, Inc. to Amend  
Marilee Special Utility District's CCN by Streamlined Expedited Release in Collin County



Public Utility Commission of Texas  
1701 N. Congress Ave  
Austin, TX 78701

**Water CCN**

-  10150 - Marilee SUD
-  12667 - City of Celina

-  Area Released
-  Property Boundary

0 200 400  
Feet



Map by: Komal Patel  
Date: January 4, 2022  
Project: 52653MarileeSUD.mxd



# Appendix B

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# 2021 **REGION C** WATER PLAN

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Volume I. Main Report

November 2020

Prepared for the Region C Water Planning  
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# Attachment Two

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*Projected Population for WUGs in  
Multiple Counties or Regions*

County	Water User Group (WUG)	Final Region C Population					
		2020	2030	2040	2050	2060	2070
JOHNSON (G)	JOHNSON COUNTY SUD	39,437	45,811	52,381	59,562	67,296	75,558
	<b>JOHNSON COUNTY SUD TOTAL</b>	<b>42,213</b>	<b>48,855</b>	<b>55,782</b>	<b>63,321</b>	<b>71,416</b>	<b>80,041</b>
COLLIN	JOSEPHINE	1,434	2,300	3,226	4,175	4,352	4,352
HUNT (D)	JOSEPHINE	184	325	517	783	783	783
	<b>JOSEPHINE TOTAL</b>	<b>1,618</b>	<b>2,625</b>	<b>3,743</b>	<b>4,958</b>	<b>5,135</b>	<b>5,135</b>
DALLAS	LEWISVILLE	841	841	841	841	841	841
DENTON	LEWISVILLE	106,485	121,082	138,526	158,014	176,513	176,513
	<b>LEWISVILLE TOTAL</b>	<b>107,326</b>	<b>121,923</b>	<b>139,367</b>	<b>158,855</b>	<b>177,354</b>	<b>177,354</b>
HENDERSON	MABANK	3,715	4,141	4,568	5,975	8,339	11,619
KAUFMAN	MABANK	6,048	6,673	7,208	9,726	13,712	19,106
VAN ZANDT (D)	MABANK	243	271	299	391	546	761
	<b>MABANK TOTAL</b>	<b>10,006</b>	<b>11,085</b>	<b>12,075</b>	<b>16,092</b>	<b>22,597</b>	<b>31,486</b>
KAUFMAN	MACBEE SUD	267	331	399	501	611	730
HUNT (D)	MACBEE SUD	346	430	544	701	925	1,250
VAN ZANDT (D)	MACBEE SUD	7,068	7,757	8,283	8,806	9,240	9,612
	<b>MACBEE SUD TOTAL</b>	<b>7,681</b>	<b>8,518</b>	<b>9,226</b>	<b>10,008</b>	<b>10,776</b>	<b>11,592</b>
ELLIS	MANSFIELD	110	130	162	236	293	361
TARRANT	MANSFIELD	67,501	85,935	102,678	127,297	146,050	164,697
JOHNSON (G)	MANSFIELD	2,576	3,695	4,849	6,115	7,481	8,942
	<b>MANSFIELD TOTAL</b>	<b>70,187</b>	<b>89,760</b>	<b>107,689</b>	<b>133,648</b>	<b>153,824</b>	<b>174,000</b>
COLLIN	MARILEE SUD	4,580	4,580	4,663	4,663	4,663	4,663
GRAYSON	MARILEE SUD	3,106	3,375	3,570	3,570	3,570	3,570
	<b>MARILEE SUD TOTAL</b>	<b>7,686</b>	<b>7,955</b>	<b>8,233</b>	<b>8,233</b>	<b>8,233</b>	<b>8,233</b>
DALLAS	MESQUITE	149,800	164,758	186,045	202,822	219,171	235,561
KAUFMAN	MESQUITE	136	170	204	257	313	374
	<b>MESQUITE TOTAL</b>	<b>149,936</b>	<b>164,928</b>	<b>186,249</b>	<b>203,079</b>	<b>219,484</b>	<b>235,935</b>
PARKER	MINERAL WELLS	2,107	2,078	2,044	2,004	1,958	1,905
PALO PINTO (G)	MINERAL WELLS	15,820	16,978	17,760	18,483	19,034	19,470

# Attachment Four

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## *Municipal Demand for WUGs in Multiple Counties or Regions*

County	Water User Group (WUG)	Region C Final Demand (Acre-Feet per Year)					
		2020	2030	2040	2050	2060	2070
HUNT (D)	MACBEE SUD	23	29	37	47	62	84
VAN ZANDT (D)	MACBEE SUD	475	521	557	592	621	646
	<b>MACBEE SUD TOTAL</b>	<b>516</b>	<b>572</b>	<b>621</b>	<b>673</b>	<b>724</b>	<b>779</b>
ELLIS	MANSFIELD	30	35	44	64	79	97
TARRANT	MANSFIELD	18,494	23,327	27,730	34,279	39,293	44,295
JOHNSON (G)	MANSFIELD	706	1,003	1,310	1,647	2,013	2,405
	<b>MANSFIELD TOTAL</b>	<b>19,230</b>	<b>24,365</b>	<b>29,084</b>	<b>35,990</b>	<b>41,385</b>	<b>46,797</b>
COLLIN	MARILEE SUD	675	665	668	666	665	665
GRAYSON	MARILEE SUD	458	490	513	510	510	508
	<b>MARILEE SUD TOTAL</b>	<b>1,133</b>	<b>1,155</b>	<b>1,181</b>	<b>1,176</b>	<b>1,175</b>	<b>1,173</b>
DALLAS	MESQUITE	22,314	23,822	26,318	28,392	30,609	32,880
KAUFMAN	MESQUITE	20	25	29	36	44	52
	<b>MESQUITE TOTAL</b>	<b>22,334</b>	<b>23,847</b>	<b>26,347</b>	<b>28,428</b>	<b>30,653</b>	<b>32,932</b>
PARKER	MINERAL WELLS	343	330	318	308	300	292
PALO PINTO (G)	MINERAL WELLS	2,579	2,692	2,759	2,840	2,919	2,985
	<b>MINERAL WELLS TOTAL</b>	<b>2,922</b>	<b>3,022</b>	<b>3,077</b>	<b>3,148</b>	<b>3,219</b>	<b>3,277</b>
ELLIS	MOUNTAIN PEAK SUD	2,971	3,733	3,937	5,635	6,517	7,309
JOHNSON (G)	MOUNTAIN PEAK SUD	1,123	1,351	1,591	1,857	2,149	2,461
	<b>MOUNTAIN PEAK SUD TOTAL</b>	<b>4,094</b>	<b>5,084</b>	<b>5,528</b>	<b>7,492</b>	<b>8,666</b>	<b>9,770</b>
COOKE	MOUNTAIN SPRING WSC	445	468	486	506	801	1,279
DENTON	MOUNTAIN SPRING WSC	9	10	11	12	13	15
	<b>MOUNTAIN SPRING WSC TOTAL</b>	<b>454</b>	<b>478</b>	<b>497</b>	<b>518</b>	<b>814</b>	<b>1,294</b>
DENTON	MUSTANG SUD	4,549	8,361	12,201	16,049	19,904	23,763
GRAYSON	MUSTANG SUD	40	39	40	40	41	41

## 5D.2.2 Greater Texoma Utility Authority

The Greater Texoma Utility Authority (GTUA) is a political subdivision of the State and is governed by a Board of Directors. GTUA provides its member cities with assistance in financing and construction of water and wastewater facilities. GTUA may also be requested to provide operations services for water and wastewater facilities by member cities and others.

An example of such services is the Collin-Grayson Municipal Alliance (CGMA). The Collin-Grayson Municipal Alliance is a pipeline to deliver water from NTMWD to Anna, Howe, Melissa and Van Alstyne in southern Grayson and northern Collin Counties. **Table 5D.20** lists the projected demands for GTUA and customers.

The GTUA has an existing water right for 83,200 acre-feet per year from Lake Texoma. Of this amount, 11,200 acre-feet per year (limited by the Sherman water treatment plant capacity) is available to existing customers as potable water. Several water users in the surrounding Cooke, Collin, Denton, and Grayson counties have water rights in Lake Texoma but no infrastructure to transport or treat the

supplies. GTUA is currently sponsoring a study to evaluate potential configurations of a Regional Water System to treat and transport these supplies.

To meet the needs of GTUA's current and future demands, the following strategies are recommended:

- **Conservation**
- **GTUA Regional Water System – Phase 1**
- **GTUA Regional Water System – Phase 2**
- **Connection from Sherman to CGMA**
- **Parallel CGMA Pipeline (NTMWD)**

If any of the projects identified in the recommended plan are not implemented, GTUA may wish to pursue an alternative strategy.

The following alternative water management strategy is recommended for GTUA:

- **Grayson County Water Supply Project**

These strategies are discussed individually below.



*Railway Bridge over Lake Texoma*

**Conservation.** Conservation is the projected conservation savings for the GTUA’s existing and potential customers, based on the recommended Region C water conservation program. Water savings by the GTUA and customers is projected to reach 4,418 acre-feet per year by 2070.

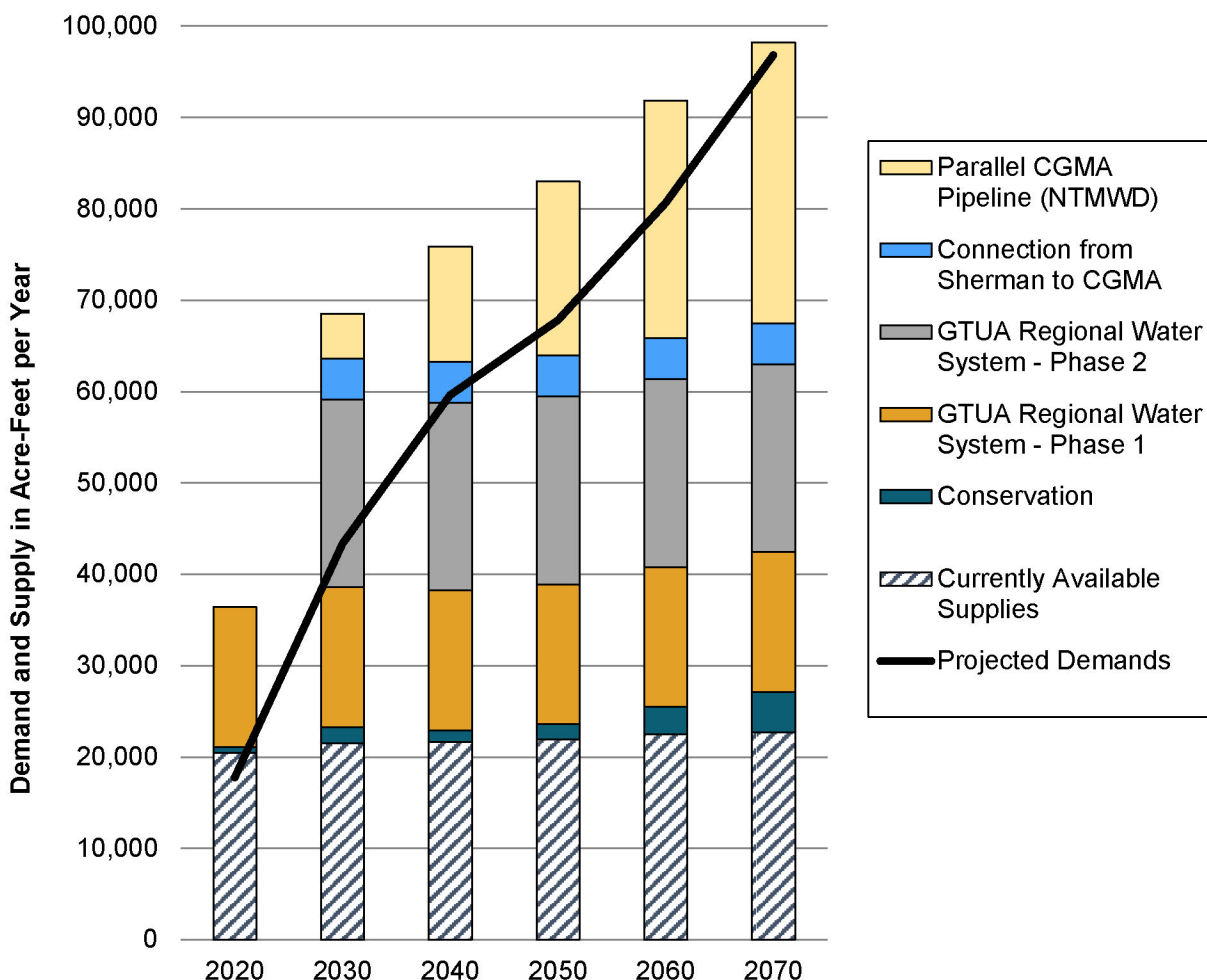
**GTUA Regional Water System (Phase I and II).** A regional water system strategy was developed for communities in northern Collin, Cooke, northern Denton and Grayson counties. Several of the entities in this area hold water rights in Lake Texoma but currently do not have access to this resource. This strategy focuses on treating

and connecting these entities to Lake Texoma supplies. Phase One will connect participating entities south of Sherman and Phase Two will connect entities west of Sherman.

**Connection from Sherman to CGMA.** The proposed connection from Sherman to CGMA plans for 5 MGD peak delivery from Sherman.

**Parallel CGMA Pipeline (NTMWD).** The proposed parallel pipeline for the CGMA is needed to increase the delivery capacity for the system beyond 16,800 acre-feet per year.

**Figure 5D.8 Recommended Strategies for Greater Texoma Utility Authority**





**Table 5D.20 Summary of Regional Water Provider Plan – Greater Texoma Utility Authority**

<b>GTUA (Ac-Ft/Yr)</b>	<b>2020</b>	<b>2030</b>	<b>2040</b>	<b>2050</b>	<b>2060</b>	<b>2070</b>
<b>Projected Demands</b>						
Sherman	4,967	5,309	5,418	6,275	10,091	18,492
County Other, Grayson	747	747	747	747	747	1,196
Dorchester	0	0	0	0	0	0
Manufacturing, Grayson	2,213	2,257	2,257	2,257	2,257	2,257
Marilee SUD	194	216	242	237	235	235
Steam Electric Power, Grayson	4,387	4,387	4,387	4,387	4,387	4,387
<i>Bells</i>	0	10	36	54	384	587
<i>County Other, Grayson (Additional)</i>	0	760	860	960	1,060	1,160
<i>KentuckyTown WSC</i>	0	47	104	160	300	487
<i>Luella SUD</i>	0	40	85	118	181	277
<i>Pottsboro</i>	0	0	0	0	0	1,126
<i>South Grayson SUD</i>	0	51	156	222	293	354
<i>Southmayd</i>	49	59	70	85	146	229
<i>Tioga</i>	0	10	19	31	265	424
<i>Tom Bean</i>	0	27	52	83	157	353
<i>Whitewright</i>	0	0	50	50	100	100
<b>Subtotal</b>	<b>12,557</b>	<b>13,920</b>	<b>14,483</b>	<b>15,666</b>	<b>20,603</b>	<b>31,664</b>
<b>Other Grayson County through Denison</b>						
Pottsboro	406	543	679	918	1,512	1,682
<b>Subtotal</b>	<b>406</b>	<b>543</b>	<b>679</b>	<b>918</b>	<b>1,512</b>	<b>1,682</b>
<b>Collin-Grayson Municipal Alliance</b>						
Anna	1,235	2,893	5,275	7,182	9,662	12,899
Howe	0	24	57	88	134	182
Grayson County Manufacturing	30	30	30	30	30	30
Melissa	3,210	11,682	16,629	20,906	24,150	25,009
Van Alstyne	10	202	475	750	1,912	2,539
<b>Subtotal</b>	<b>4,485</b>	<b>14,831</b>	<b>22,466</b>	<b>28,956</b>	<b>35,888</b>	<b>40,659</b>
<b>GTUA Regional System (Future)</b>						
Celina	0	5,605	5,605	5,605	5,605	5,605
Collinsville	0	91	153	231	256	411
County Other, Collin (Weston)	0	550	1,099	1,099	1,099	1,099
Gainesville and Customers	0	1,632	5,605	5,605	5,605	5,605
Gunter	297	695	2,859	2,859	2,859	2,859
Lake Kiowa SUD	0	886	886	886	886	886
Marilee SUD (Additional)	0	1,390	1,558	1,558	1,515	1,439
Northwest Grayson County WCID 1	0	194	572	572	572	572
Pilot Point	0	975	1,256	1,256	1,256	1,256

<b>GTUA (Ac-Ft/Yr)</b>	<b>2020</b>	<b>2030</b>	<b>2040</b>	<b>2050</b>	<b>2060</b>	<b>2070</b>
Two Way SUD	0	867	1,007	1,204	1,603	1,682
Whitesboro	0	461	453	441	471	471
Woodbine WSC	0	716	942	942	942	942
<b>Subtotal</b>	<b>297</b>	<b>14,062</b>	<b>21,995</b>	<b>22,258</b>	<b>22,669</b>	<b>22,827</b>
<b>Projected Demands</b>	<b>17,745</b>	<b>43,356</b>	<b>59,623</b>	<b>67,798</b>	<b>80,672</b>	<b>96,832</b>
<i>Treated Water Demand</i>	<i>13,358</i>	<i>38,969</i>	<i>55,236</i>	<i>63,411</i>	<i>76,285</i>	<i>92,445</i>
<i>Raw Water Demand</i>	<i>4,387</i>	<i>4,387</i>	<i>4,387</i>	<i>4,387</i>	<i>4,387</i>	<i>4,387</i>
<b>Existing Supplies</b>						
Lake Texoma (Potable-Limited by Sherman WTP)	11,210	11,210	11,210	11,210	11,210	11,210
Supply for Pottsboro (from Denison)	406	543	679	918	1,512	1,682
Collin-Grayson Municipal Alliance Pipeline Project (From NTMWD)	4,485	5,400	5,400	5,400	5,400	5,400
Potable Water Available	16,101	17,153	17,289	17,528	18,122	18,292
Lake Texoma Raw (current use) <sup>a</sup>	4,387	4,387	4,387	4,387	4,387	4,387
<b>Total Supplies</b>	<b>20,488</b>	<b>21,540</b>	<b>21,676</b>	<b>21,915</b>	<b>22,509</b>	<b>22,679</b>
<b>Treated Water Need (Demand-Supply)</b>	<b>0</b>	<b>21,816</b>	<b>37,947</b>	<b>45,883</b>	<b>58,163</b>	<b>74,153</b>
<b>Raw Water Need (Demand-Supply)</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>0</b>
<b>Water Management Strategies</b>						
Conservation (Wholesale Customers)	607	1,712	1,249	1,668	2,965	4,418
GTUA Regional Water System – Phase 1	15,332	15,332	15,332	15,332	15,332	15,332
GTUA Regional Water System – Phase 2	0	20,540	20,540	20,540	20,540	20,540
Connection from Sherman to CGMA	0	4,484	4,484	4,484	4,484	4,484
Parallel CGMA Pipeline (NTMWD)	0	4,947	12,582	19,072	26,004	30,775
<b>Total Supplies from Strategies</b>	<b>15,939</b>	<b>47,015</b>	<b>54,187</b>	<b>61,096</b>	<b>69,325</b>	<b>75,549</b>
<b>Total Supplies</b>	<b>36,427</b>	<b>68,555</b>	<b>75,863</b>	<b>83,011</b>	<b>91,834</b>	<b>98,228</b>
<b>Reserve or (Shortage)</b>	<b>18,682</b>	<b>25,200</b>	<b>16,240</b>	<b>15,213</b>	<b>11,162</b>	<b>1,396</b>
<b>Management Supply Factor</b>	<b>2.05</b>	<b>1.58</b>	<b>1.27</b>	<b>1.22</b>	<b>1.14</b>	<b>1.01</b>

<sup>a</sup>GTUA has a water right in Texoma for 83,200 acre-feet per year. Currently, they have facilities to use 11,210 acre-feet per year of treated water and 6,163 acre-feet per year of raw water. Use of additional water will require additional facilities.

**Table 5D.21 Summary of Costs for Recommended Strategies - GTUA**

Strategy	Date to be Developed	Quantity for GTUA (Ac-Ft/Yr)	GTUA Share of Capital Costs	Unit Cost (\$/1000 gal)		Table for Details
				With Debt Service	After Debt Service	
Conservation <sup>a</sup>	2020	4,418	Included under County Summaries in Chapter 5E.			
GTUA Regional Water System – Phase 1	2020	15,332	\$243,986,000	\$5.72	\$3.06	H.72
GTUA Regional Water System – Phase 2	2030	20,540	\$224,083,000	\$4.75	\$2.93	H.73
Connection from Sherman to CGMA	2030	4,484	\$31,115,000	\$1.78	\$0.28	H.71
Parallel CGMA Pipeline (NTMWD)	2030	30,775	\$89,989,000	\$3.55	\$2.72	H.70
<b>Total GTUA Capital Costs</b>			<b>\$589,173,000</b>			

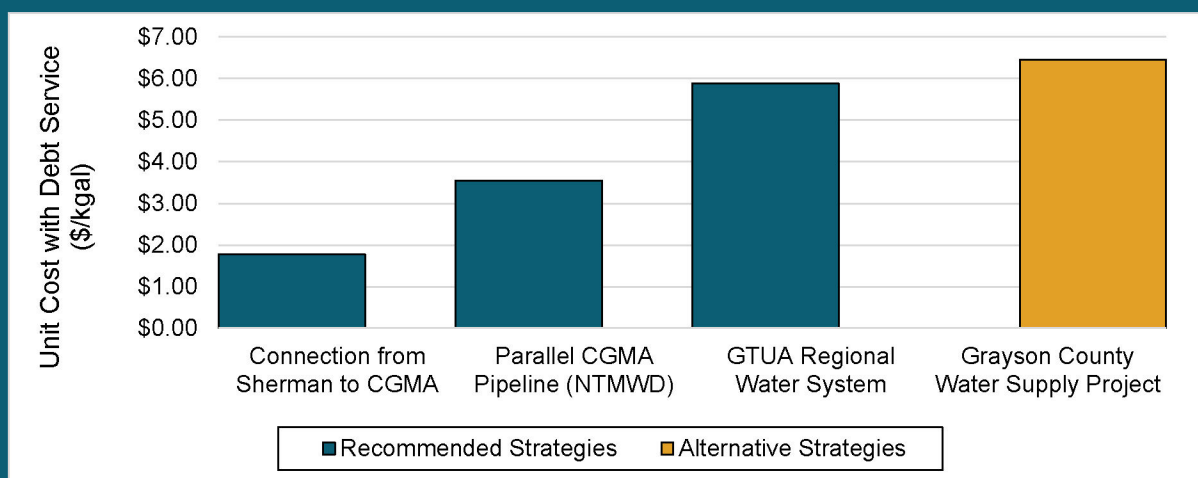
<sup>a</sup>GTUA has no retail sales, so conservation savings are reflected in their customers' conservation savings.

**Table 5D.22 Summary of Costs for Alternative Strategies - GTUA**

Strategy	Date to be Developed	Quantity for GTUA (Ac-Ft/Yr)	GTUA Share of Capital Costs	Unit Cost (\$/1000 gal)		Table for Details
				With Debt Service	After Debt Service	
Grayson County Water Supply Project	2020	37,610	\$657,965,000	\$6.45	\$3.53	H.74
<b>Total GTUA Capital Costs</b>			<b>\$657,965,000</b>			

### Strategy Unit Costs

Costs were developed for both recommended and alternative strategies. Costs are summarized in Table 5D.21 and Table 5D.22.



### Marilee Special Utility District

Marilee SUD is located in northeastern Collin County and southwestern Grayson County. The SUD currently gets its water supplies from treated water purchased from Sherman and from the Trinity aquifer. Water management strategies include conservation and additional water from Sherman through the GTUA Regional Water System. **Table 5E.212** shows the projected population and demand, the current supplies, and the water management strategies for Marilee SUD.

**Table 5E.212 Summary of Water User Group – Marilee SUD**

<b>(Values in Ac-Ft/Yr)</b>	<b>2020</b>	<b>2030</b>	<b>2040</b>	<b>2050</b>	<b>2060</b>	<b>2070</b>
<b>Projected Population</b>	<b>7,686</b>	<b>7,955</b>	<b>8,233</b>	<b>8,233</b>	<b>8,233</b>	<b>8,233</b>
<b>Projected Demands</b>						
Municipal Demand	1,133	1,155	1,181	1,176	1,174	1,174
<b>Total Projected Demand</b>	<b>1,133</b>	<b>1,155</b>	<b>1,181</b>	<b>1,176</b>	<b>1,174</b>	<b>1,174</b>
<b>Currently Available Supplies</b>						
Trinity Aquifer	939	939	939	939	939	939
Sherman	194	216	242	237	192	116
<b>Total Currently Available Supplies</b>	<b>1,133</b>	<b>1,155</b>	<b>1,181</b>	<b>1,176</b>	<b>1,131</b>	<b>1,055</b>
<b>Need (Demand – Supply)</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>43</b>	<b>119</b>
<b>Water Management Strategies</b>						
Water Conservation	10	14	12	16	20	23
GTUA Regional Water System	0	1,376	1,546	1,542	1,538	1,535
<b>Total Supplies from Strategies</b>	<b>10</b>	<b>1,390</b>	<b>1,558</b>	<b>1,558</b>	<b>1,558</b>	<b>1,558</b>
<b>Reserve (Shortage)</b>	<b>10</b>	<b>1,390</b>	<b>1,558</b>	<b>1,558</b>	<b>1,515</b>	<b>1,439</b>

### Mustang Special Utility District

Mustang SUD is located in northeastern Denton County and Grayson County. The SUD is a wholesale water provider, and the discussion of its water supply plans is under Denton County in **Section 5E.4**.

## Sherman

Sherman is the largest city in Grayson County and is located in the center of the county. Sherman is a wholesale water provider (WWP) that provides water to Grayson County Steam Electric Power, Grayson County Manufacturing, Grayson County Other, Dorchester and Marilee Special Utility District.

In the future, Sherman is assumed to treat water for other water suppliers in Collin, Grayson, Denton, and Cooke Counties through their own Texoma supplies, the GTUA Regional Water System and the existing Collin-Grayson Municipal Alliance (Anna, Howe, Melissa and Van Alstyne).

Several water users in the county plan to participate in the GTUA Regional Water System. Several entities hold water rights in Lake Texoma but currently do not have access to this resource. The GTUA Regional Water System strategy would make additional supplies available by treating Lake Texoma water and delivering to these WUGs. The strategy assumes that supplies will be transported to and then treated at the existing Sherman WTP. Details on the GTUA Regional Water System are discussed further in **Appendix G**.

Sherman uses groundwater from the Trinity and Woodbine aquifers and water from Lake Texoma purchased from the Greater Texoma Utility Authority. Sherman's existing water treatment plant has a peak capacity of 20 MGD and is capable of treating the high TDS levels from Lake Texoma without needing to blend with other sources. There are sufficient supplies in Lake Texoma to meet needs for Sherman and its customers over the planning period. Recommended water management strategies include expanding the existing treatment plant and the necessary raw water delivery infrastructure. Planned WTP expansions will be located at the existing site.

**Table 5E.218** shows the projected demand, the current supplies, and the water management strategies for Sherman.

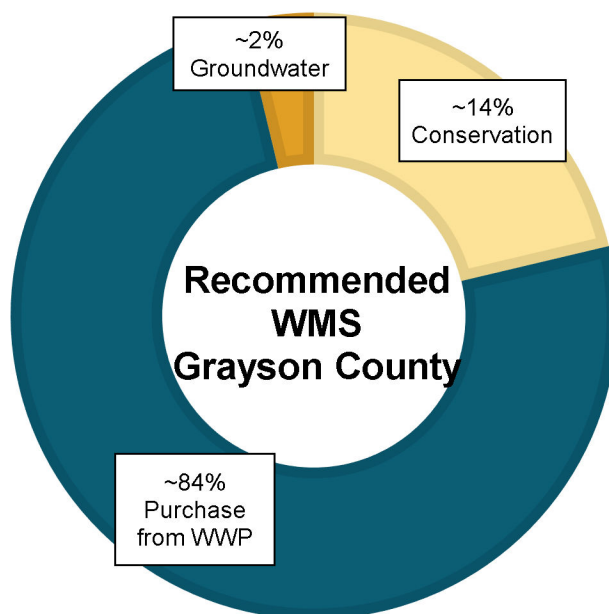
**Table 5E.218 Summary of Wholesale Water Provider and Customers – Sherman**

(Values in Ac-Ft/Yr)	2020	2030	2040	2050	2060	2070
<b>Projected Demands</b>						
Sherman	10,701	11,043	11,152	12,009	15,825	24,226
County Other, Grayson	747	747	747	747	747	1,196
Dorchester	84	84	84	84	84	84
Manufacturing, Grayson	2,213	2,257	2,257	2,257	2,257	2,257
Marilee SUD	194	216	242	237	235	235
Steam Electric Power, Grayson	4,387	4,387	4,387	4,387	4,387	4,387
<b>Future Direct Customers</b>						
Anna	0	1,235	875	1,053	1,112	1,207
Bells	0	10	36	54	384	587
County Other, Grayson (Additional)	0	760	860	960	1,060	1,160
Howe	0	7	11	14	17	20
Manufacturing, Grayson	0	9	6	5	4	3
Kentucky Town WSC	0	47	104	160	300	487
Luella SUD	0	40	85	118	181	277
Melissa	0	3,172	3,497	3,296	3,112	2,974
Pottsboro	0	0	0	0	0	1,126
South Grayson SUD	0	51	156	222	293	354
Southmayd	49	59	70	85	146	229
Tioga	0	10	19	31	265	424
Tom Bean	0	27	52	83	157	353
Van Alstyne	0	61	95	116	239	280
Whitewright	0	0	50	50	100	100
<b>GTUA Regional Water System Customers</b>						
Celina	0	5,605	5,605	5,605	5,605	5,605
Collinsville	0	91	153	231	256	411
County Other, Collin (Weston)	0	550	1,099	1,099	1,099	1,099
Gainesville and Customers	0	1,632	5,605	5,605	5,605	5,605
Gunter	297	695	2,859	2,859	2,859	2,859
Lake Kiowa SUD	0	886	886	886	886	886
Marilee SUD (Additional)	0	1,390	1,558	1,558	1,515	1,439
Northwest Grayson County WCID 1	0	194	572	572	572	572
Pilot Point	0	975	1,256	1,256	1,256	1,256
Two Way SUD	0	867	1,007	1,204	1,603	1,682
Whitesboro	0	461	453	441	471	471
Woodbine WSC	0	716	942	942	942	942
<b>Total Projected Demand</b>	<b>18,672</b>	<b>38,284</b>	<b>46,780</b>	<b>48,226</b>	<b>53,574</b>	<b>64,793</b>
Treated Water Demand	14,285	33,897	42,393	43,839	49,187	60,406
Raw Water Demand (for SEP)	4,387	4,387	4,387	4,387	4,387	4,387

<b>(Values in Ac-Ft/Yr)</b>	<b>2020</b>	<b>2030</b>	<b>2040</b>	<b>2050</b>	<b>2060</b>	<b>2070</b>
<b>Currently Available Supplies</b>						
Trinity Aquifer	4,822	4,822	4,822	4,822	4,822	4,822
Woodbine Aquifer	996	996	996	996	996	996
GTUA (Lake Texoma, Treated, Limited by WTP)	11,210	11,210	11,210	11,210	11,210	11,210
GTUA (Lake Texoma, Raw for SEP)	4,387	4,387	4,387	4,387	4,387	4,387
<b>Total Currently Available Supplies (Treated Supplies)</b>	<b>17,028</b>	<b>17,028</b>	<b>17,028</b>	<b>17,028</b>	<b>17,028</b>	<b>17,028</b>
<b>Total Currently Available Supplies (Raw Supplies)</b>	<b>4,387</b>	<b>4,387</b>	<b>4,387</b>	<b>4,387</b>	<b>4,387</b>	<b>4,387</b>
<b>Treated Need (Demand – Supply)</b>	<b>0</b>	<b>16,869</b>	<b>25,365</b>	<b>26,811</b>	<b>32,159</b>	<b>43,378</b>
<b>Raw Water Need (Demand – Supply)</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>0</b>
<b>Water Management Strategies</b>						
Conservation (retail)	152	206	195	251	1,048	1,868
Conservation (wholesale)	93	190	173	216	352	732
Additional Texoma Supply from GTUA:	20,937	41,477	47,082	47,082	52,687	63,897
<i>GTUA Regional Water System</i>	15,332	35,872	35,872	35,872	35,872	35,872
<i>10 MGD WTP Expansion (desal)</i>	5,605	5,605	5,605	5,605	5,605	5,605
<i>10 MGD WTP Expansion (desal)</i>			5,605	5,605	5,605	5,605
<i>10 MGD WTP Expansion (desal)</i>					5,605	5,605
<i>20 MGD WTP Expansion (desal)</i>						11,210
<b>Total Supplies from Strategies</b>	<b>21,182</b>	<b>41,873</b>	<b>47,450</b>	<b>47,549</b>	<b>54,087</b>	<b>66,497</b>
<b>Reserve (Shortage)</b>	<b>42,597</b>	<b>63,288</b>	<b>68,865</b>	<b>68,964</b>	<b>75,502</b>	<b>87,912</b>

## 5E.8.2 Summary of Costs for Grayson County

**Table 5E.228** summarizes the costs of the water management strategies recommended for the WUGs and WWPs who have the majority of their demand located in Grayson County. Total quantities from **Table 5E.228** will not necessarily match total county demands. This is due mainly to water users whose sum of strategies results in a reserve as well as due to water users located in multiple counties (or wholesale water providers who develop strategies and then sell water to users in other counties). Quantities from infrastructure projects needed to deliver and/or treat water (shown in *gray italics*) are not included since the supplies are associated with other strategies. To avoid double-counting quantities of supplies, the quantities in *gray italics* are **not** included in the total.



The majority of the future supplies needed to meet demands within Collin County are projected to come through purchases from wholesale water providers and the GTUA Regional System Project. Other strategies include conservation and groundwater.

**Table 5E.229** summarizes the recommended water management strategies within Grayson County individually. Alternative strategies are also included. More detailed cost estimates are located in **Appendix H**.

**Table 5E.228 Summary of Recommended Water Management Strategies for Grayson County**

Type of Strategy	Quantity (Ac-Ft/Yr)	Capital Costs
Conservation <sup>a</sup>	4,491	\$2,036,218
Purchase from WWP	28,114	\$0
<i>Additional Infrastructure</i>	<i>45,167</i>	<i>\$543,531,000</i>
Groundwater	790	\$10,214,000
<b>Total</b>	<b>33,395</b>	<b>\$555,781,218</b>

<sup>a</sup>The conservation quantities represent the sum of the individual water user groups who have the majority of their service areas located in the county, not the total conservation in the county.



**Table 5E.229 Costs for Recommended Water Management Strategies for Grayson County**

WWP or WUG	Strategy	Online by:	Quantity (Ac-Ft/Yr) <sup>b</sup>	Capital Costs <sup>c</sup>	Unit Cost (\$/1000 gal)		Table
					With Debt Service	After Debt Service	
<b>WWPs</b>							
Denison	Conservation (retail)	2020	1,695	\$698,755	\$1.65	\$0.83	H.11
	Conservation (wholesale)	2020	Included with WUGs.				
	<i>New 4 MGD Desalination WTP</i>	2030	2,242	\$36,137,000	\$7.33	\$3.85	H.13
	<i>10 MGD Desalination WTP Expansion</i>	2060	4,531	\$82,213,000	\$6.46	\$3.30	H.12
	<i>Expand Raw Water Delivery from Lake Texoma - Phase I</i>	2030	2,242	\$17,674,000	\$1.95	\$0.25	H.127
	<i>Expand Raw Water Delivery from Lake Texoma - Phase II</i>	2060	5,605	\$9,022,000	\$0.41	\$0.06	H.128
Sherman	Conservation (retail)	2020	1,868	\$628,668	\$0.89	\$0.00	H.11
	Conservation (wholesale)	2020	Included with WUGs.				
	GTUA Regional Water System	2020	13,045	See GTUA in <b>Chapter 5D</b> .			
	<i>10 MGD WTP Expansion (desal)</i>	2020	5,605	\$82,213,000	\$6.46	\$3.30	H.13
	<i>10 MGD WTP Expansion (desal)</i>	2040	5,605	\$82,213,000	\$6.46	\$3.30	H.13
	<i>10 MGD WTP Expansion (desal)</i>	2060	5,605	\$82,213,000	\$6.46	\$3.30	H.13
	<i>20 MGD WTP Expansion (desal)</i>	2070	11,210	\$149,002,000	\$5.90	\$3.03	H.13
<b>WUGs</b>							
Bells	Conservation	2020	16	\$292,347	\$31.56	\$0.00	H.11
	Connect to Sherman	2030	571	\$0	\$3.48	\$3.48	None
	New Well(s) in Woodbine Aquifer	2030	55	\$822,000	\$5.91	\$2.68	H.14
Collinsville	Conservation	2020	13	\$16,010	\$1.73	\$0.00	H.11
	GTUA Regional Water System	2030	398	\$0	\$4.75	\$2.93	None
Desert WSC	Conservation	See Fannin County.					
	New Well						
Dorchester	Conservation	2020	3	\$5,172	\$1.12	\$0.00	H.11

WWP or WUG	Strategy	Online by:	Quantity (Ac-Ft/Yr) <sup>b</sup>	Capital Costs <sup>c</sup>	Unit Cost (\$/1000 gal)		Table
					With Debt Service	After Debt Service	
	New Well(s) in Trinity Aquifer	2020	90	\$1,845,000	\$6.33	\$1.90	H.14
Gunter	Conservation	2020	19	\$22,898	\$6.30	\$0.00	H.11
	New Well(s) in Trinity Aquifer	2020	50	\$1,835,000	\$10.41	\$2.48	H.14
	GTUA Regional Water System	2030	2,854	\$0	\$5.72	\$3.06	None
Howe	Conservation	2020	9	\$28,900	\$3.12	\$0.00	H.11
	NTMWD through GTUA (CGMA)	2040	66	\$0	\$0.50	\$0.50	None
	Sherman through GTUA (CGMA)	2030	20	\$0	\$3.48	\$3.48	None
	<i>CGMA Supplies</i>	<i>2030</i>	<i>86</i>	<i>See GTUA in Chapter 5D.</i>			
	<i>ALTERNATIVE Grayson County Water Supply Project</i>	<i>2030</i>	<i>79</i>	<i>See GTUA in Chapter 5D.</i>			
Kentuckytown WSC	Conservation	2020	17	\$18,044	\$1.30	\$0.00	H.11
	Connect to Sherman	2030	470	\$0	\$3.48	\$3.48	None
Luella SUD	Conservation	2020	13	\$23,749	\$1.71	\$0.00	H.11
	Connect to Sherman	2040	264	\$0	\$3.48	\$3.48	None
Marilee SUD <sup>a</sup>	Conservation	See Collin County.					
	Sherman						
Mustang SUD <sup>a</sup>	Conservation	See Denton County.					
	Other measures						
Northwest Grayson County WCID 1	Conservation	2020	8	\$4,053	\$0.44	\$0.00	H.11
	GTUA Regional Water System	2030	572	\$0	\$4.75	\$2.93	H.73
	New Well(s) in Trinity Aquifer	2020	247	\$2,730,000	\$4.18	\$1.80	H.14
Oak Ridge South Gale WSC	Conservation	2020	9	\$6,787	\$0.73	\$0.00	H.11
	Denison	2020	225	\$0	\$3.00	\$3.00	None
Pink Hill WSC	Conservation	2020	10	\$10,957	\$1.18	\$0.00	H.11
	New Well(s) in Woodbine Aquifer	2030	124	\$1,088,000	\$3.72	\$1.83	H.14

WWP or WUG	Strategy	Online by:	Quantity (Ac-Ft/Yr) <sup>b</sup>	Capital Costs <sup>c</sup>	Unit Cost (\$/1000 gal)		Table
					With Debt Service	After Debt Service	
	New Well(s) in Trinity Aquifer	2030	124	\$1,088,000	\$3.72	\$1.83	H.14
Pottsboro	Conservation	2020	211	\$26,823	\$1.41	\$0.82	H.11
	Denison	2020	1,009	\$0	\$3.00	\$3.00	None
	Connect to Sherman	2070	915	\$0	\$3.48	\$3.48	None
Red River Authority of Texas	Conservation	2020	9	\$30,217	\$2.17	\$0.00	H.11
South Grayson SUD <sup>a</sup>	Conservation	2020	17	\$7,852	\$0.34	\$0.00	H.11
	Connect to Sherman	2030	337	\$0	\$3.48	\$3.48	None
Southmayd	Conservation	2020	6	\$10,849	\$2.34	\$0.00	H.11
	Connect to Sherman	2020	223	\$0	\$3.48	\$3.48	None
Southwest Fannin County SUD <sup>a</sup>	Conservation	See Fannin County.					
	New Well in Woodbine with Transmission Facilities						
	Fannin County WSP						
Starr WSC	Conservation	2020	10	\$14,384	\$1.55	\$0.00	H.11
Tioga	Conservation	2020	95	\$14,836	\$0.19	\$0.00	H.11
	Connect to Sherman	2050	329	\$0	\$3.48	\$3.48	None
	<i>ALTERNATIVE Grayson County Water Supply Project</i>	2050	329	<i>See GTUA in Chapter 5D.</i>			
Tom Bean	Conservation	2020	168	\$9,742	\$1.05	\$0.99	H.11
	Connect to Sherman	2060	185	\$0	\$3.48	\$3.48	None
Two Way SUD <sup>a</sup>	Conservation	2020	46	\$39,344	\$1.70	\$0.11	H.11
	GTUA Regional Water System	2030	1,636	\$0	\$4.75	\$2.93	None
Van Alstyne	Conservation	2020	181	\$41,490	\$0.37	\$0.04	H.11
	Sherman through GTUA (CGMA)	2030	280	\$0	\$3.48	\$3.48	None
	NTMWD through GTUA (CGMA)	2040	1,067	\$0	\$0.50	\$0.50	None
	<i>CGMA Supplies</i>	2040	1,347	<i>See GTUA in Chapter 5D.</i>			

WWP or WUG	Strategy	Online by:	Quantity (Ac-Ft/Yr) <sup>b</sup>	Capital Costs <sup>c</sup>	Unit Cost (\$/1000 gal)		Table
					With Debt Service	After Debt Service	
	<i>Water System Improvements</i>	2040	1,067	\$2,844,000	\$0.72	\$0.15	H.129
Westminster WSC <sup>a</sup>	Conservation	See Collin County.					
Whitesboro	Conservation	2020	15	\$44,649	\$2.41	\$0.00	H.11
	GTUA Regional Water System	2030	462	\$0	\$4.75	\$2.93	None
Whitewright <sup>a</sup>	Conservation	2020	6	\$21,871	\$2.36	\$0.00	H.11
	Connect to Sherman	2040	96	\$0	\$3.48	\$3.48	None
Woodbine WSC <sup>a</sup>	Conservation	See Cooke County.					
	GTUA Regional Water System						
<b>County Other and Non-Municipal</b>							
County Other, Grayson	Conservation	2020	47	\$17,821	\$0.64	\$0.00	H.11
	Denison	2020	205	\$0	\$3.00	\$3.00	None
	Sherman	2020	1,719	\$0	\$3.48	\$3.48	None
Irrigation, Grayson	None	None					
Livestock, Grayson	None	None					
Manufacturing, Grayson	Sherman	2060	1,144	\$0	\$3.48	\$3.48	None
	NTMWD through GTUA (CGMA)	2030	13	\$0	\$0.50	\$0.50	None
	Sherman through GTUA (CGMA)	2030	9	\$0	\$3.48	\$3.48	None
	<i>CGMA Supplies</i>	2030	22	<i>See GTUA in Chapter 5D.</i>			
	<i>ALTERNATIVE Direct Reuse from Sherman</i>	2020	561	\$8,289,000	\$3.80	\$0.61	H.130
Mining, Grayson	New Well(s) in Trinity Aquifer	2020	100	\$806,000	\$2.04	\$0.29	H.14
Steam Electric Power, Grayson	None	None					

<sup>a</sup>Water User Groups extend into more than one county

<sup>b</sup>Quantities listed are for the WUG only. They do not include the WUG's customers.

<sup>c</sup>Purchases from wholesale water providers that require no new infrastructure have no capital costs. The unit costs shown in the table represent the cost to purchase water from the WWP.

# Appendix C

Appendix C  
Schedule 1  
Selected Appraisal Reports Summary for Decertified CCN Parcels

Trans. No.	Control No.	CCN Holder (CCN No.)	Appraiser	Value for Factor: (1)									Notes	Final Commission Order (if any)	
				A	B	C	D	E	F	G	H	Total			
1	44555	Tall Timbers Utility Company, Inc. (20694 S)	NewGen Strategies & Solutions										\$ -	Conclusion that there is no property that has been rendered useless and valueless as a result of decertification by the TCEQ and the provision of service by the City to the area in question.	No Compensation due.
2	45244	Aqua Texas, Inc. (13201 W, 21059 S)	NewGen Strategies & Solutions										\$ -	Conclusion that there is no property that has been rendered useless and valueless as a result of decertification by the TCEQ and the provision of service by the City to the area in question.	Fort Worth owes no compensation to Aqua and may provide retail water and sewer service to the Property.
3	45292	Suetrak USA Company, Inc. (11916 W, 20629 S)	NewGen Strategies & Solutions										\$ -	Conclusion that there is no property that has been rendered useless and valueless as a result of decertification by the TCEQ and the provision of service by the City to the area in question.	No Compensation due.
4	45450	Aqua Texas, Inc. (13201 W)	NewGen Strategies & Solutions	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ 542	\$ -	\$ 542	Conclusion that there is no property that has been rendered useless and valueless as a result of decertification by the TCEQ and the provision of service by Mustang SUD to the area in question. However, if a monetary compensation determination were to be made, it is our opinion that the compensation to be provided is \$541.96.	No Compensation due.	
5	45462	Aqua Texas, Inc. (13201 W)	NewGen Strategies & Solutions	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ 4,341	\$ -	\$ 4,341	Conclusion that there is no property that has been rendered useless and valueless as a result of decertification by the TCEQ and the provision of service by Mustang SUD to the area in question. However, if a monetary compensation determination were to be made, it is our opinion that the compensation to be provided is \$541.96.	No Compensation due.	
6	45679	Guadalupe-Blanco River Authority (20892 S)	DGRA, Inc.	\$ 29,933	\$ -	\$ -	\$ -	\$ 4,225	\$ -	\$ 10,000	\$ -	\$ 44,158	Appraiser for Zipp Road Utility Company, LLC.	Under the settlement agreement, Zipp Road and Guadalupe-Blanco agree that Zipp Road will obtain wholesale sewer treatment services from Guadalupe-Blanco for the area Zipp Road seeks to certificate. Because Zipp Road is obtaining wholesale sewer treatment services from Guadalupe-Blanco, no property of Guadalupe-Blanco will be rendered useless or valueless by the decertification of certificate 20892.	
6			NewGen Strategies & Solutions	\$ 747,940						\$ 11,000		\$ 758,940	Appraiser for GBRA (previous CCN Holder) The particular circumstances in this decertification limit GBRA compensation to: 1) The allocable share of debt and loan payments until the excess capacity in the collection system and WWTP are fully utilized; and 2) Reasonable legal expenses related to the decertification.		
6			Jones-Heroy & Associates, Inc.	\$ 438,900	\$ -	\$ 271,100	\$ -	\$ -	\$ -	\$ 20,000	\$ -	\$ 730,000			
7	45702	Green Valley Special Utility District (20973 S)	NewGen Strategies & Solutions										\$ -	Conclusion that there is no property that has been rendered useless and valueless as a result of decertification by the TCEQ and the provision of service by the City to the area in question.	

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Selected Appraisal Reports Summary for Decertified CCN Parcels

Trans. No.	Control No.	CCN Holder (CCN No.)	Appraiser	Value for Factor: (1)									Notes	Final Commission Order (if any)
				A	B	C	D	E	F	G	H	Total		
8	45848	Aqua Texas, Inc. (13201 W, 21059 S)	Jones-Heroy & Associates, Inc.	\$ -	\$ -	\$ 28,000	\$ -	\$ -	\$ -	\$ 10,000	\$ -	\$ 38,000		1. Aqua does not have any property that was rendered useless or valueless as a result of the decertification in Docket No. 45329.
8			KOR Group	\$ -	\$ -	\$ 38,250	\$ -	\$ -	\$ -	\$ 31,589	\$ 916,107	\$ 985,946	In order to determine the lost economic opportunity, and intangible personal property right, firm analyzed the achievable profits that are lost due to the decertification over a 25-year time period and included under other factors.	2. Celina does not owe any compensation to Aqua and may provide water and sewer service to the tract that was decertified in Docket No. 45329. Aqua appealed but did not find anything in this case number about the appeal.
8			B&D Environmental Inc.	\$ -	\$ -	\$ 38,250	\$ -	\$ -	\$ -	\$ 31,589	\$ -	\$ 69,839		
9	45956	Green Valley Special Utility District (20973 S)	NewGen Strategies & Solutions	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	NewGen preliminary value \$0, however, they reserved the right to update the valuation based on additional information being provided. They also pointed out that Rule 24.120 (g) provides for the reimbursement of reasonable legal and professional fees.	No Compensation due. Green Valley Special Utility District filed a motion for Rehearing.
10	50109	Aqua Texas, Inc. (13203 W, 21065 S)	NewGen Strategies & Solutions	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	NewGen Valuation Report showed \$0 value.	No Compensation due, however, parties agreed to pay \$4,000.
11	50258	UA Holdings 1994-5, LP (20586 S)	NewGen Strategies & Solutions	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	NewGen Valuation Report showed \$0 value.	No Compensation due.
12	50495	City of Lakewood Village (20075 W)	Kimley-Horn	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -		No compensation is owed by the petitioner to the CCN holder for the streamlined expedited release.
13	50787	Tall Timbers Utility Company, Inc. (20694 S)	NewGen Strategies & Solutions	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	NewGen opinion that the compensation determination for the area subject to the Landowner's application for Expedited Decertification is zero dollars (\$0.00), with the exception that Liberty Utilities should be allowed to recover necessary and reasonable legal and professional fees as approved by the Commission.	Filed Motion of Abatement on 4/1/2021 stating parties have reached an agreement in principle on compensation and, in lieu of further pursuing the appraisal process, will coordinate to memorialize the details of their agreement in writing.
14	51044	Rockett Special Utility District (10099 W)	Willdan Financial Services	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	Willdan opinion that the compensation determination for the area subject to the Landowner's application for Expedited Decertification is zero dollars (\$0.00), with the exception that Rockett Special Utility District should be allowed to recover necessary and reasonable legal and professional fees as approved by the Commission.	No Compensation due.
15	51166	SWWC Utilities, Inc. (11978 W and 20650 S)	DGRA, Inc.	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ 10,000	\$ -	\$ 10,000	Only value is for necessary and reasonable legal expenses and professional fees. However, this is an estimate as no expense information was provided to the appraiser.	No Compensation due.

Appendix C  
Schedule 1  
Selected Appraisal Reports Summary for Decertified CCN Parcels

Trans. No.	Control No.	CCN Holder (CCN No.)	Appraiser	Value for Factor: (1)									Notes	Final Commission Order (if any)	
				A	B	C	D	E	F	G	H	Total			
16	51595	Rockett Special Utility District (10099 W)	Willdan Financial Services	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	Willdan opinion that the compensation determination for the area subject to the Landowner's application for Expedited Decertification is zero dollars (\$0.00), with the exception that Rockett Special Utility District should be allowed to recover necessary and reasonable legal and professional fees as approved by the Commission.	No Compensation due.
17	51824	Town of Little Elm (11202 W)	Willdan Financial Services	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	Kimley-Horn's Valuation Report showed \$0 value	No Compensation due.
18	51933	CC Water Works Inc. (13038 W)	B & D Environmental, Inc.	\$ -	\$ -	\$ -	\$ -	\$ 202,741	\$ -	\$ 17,440	\$ -	\$ 220,181		Commission ordered \$11,435 for legal expenses and professional fees.	
18			Malone Wheeler, Inc.	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ 2,500	\$ -	\$ 2,500	Only value is for necessary and reasonable legal expenses and professional fees, which they valued at \$2,500.		
18			NewGen Strategies & Solutions	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ 11,435	\$ -	\$ 11,435	Only value is for necessary and reasonable legal expenses and professional fees, which is currently \$11,435.		
19	51933	H-M-W Special Utility District (10342 W)	Stanton Park Advisors LLC	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ 6,549,000	\$ 6,549,000	Appraiser did not follow the standard approach based on the code, but rather provided an appraisal of the potential lost profits if HMW SUD had been able to provide service to the property.	Commission ordered \$648 for debt service.	
19			NewGen Strategies & Solutions	\$ 648		\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ 648	NewGen identified a portion of debt service as well as necessary and reasonable legal expenses and professional fees, for which they did not provide a value.		
19			B & D Environmental, Inc.	\$ 648	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ 648	B&D Environmental, Inc. opinion that the compensation determination for the area subject to the Landowner's application for Expedited Decertification is \$648 related to debt services, together with the exception that HMW SUD should be allowed to recover necessary and reasonable legal and professional fees as approved by the Commission.		
20	52090	Dobbin Plantersville Water Supply Corporation (11052 W)	NewGen Strategies & Solutions	\$ 9,719	\$ -	\$ -	\$ -	\$ -	\$ -	\$ 8,763	\$ -	\$ 18,482	NewGen identified a portion of debt service associated with a USDA Rural Development Loan as well as necessary and reasonable legal expenses and professional fees, for which they provided a value of \$8,763.	No Compensation due, since CCN Holder did not file an Appraisal Report.	

Notes: (1) Value Factors shown above include:

- A The amount of the retail public utility's debt allocable for service to the area in question.
- B The value of the service facilities of the retail public utility located within the area in question.
- C The amount of any expenditures for planning, design, or construction of service facilities that are allocable to service to the area in question.
- D The amount of the retail public utility's contractual obligations allocable to the area in question.
- E Any demonstrated impairment of service or increase of cost to consumers of the retail public utility remaining after the decertification.
- F The impact on future revenues lost from existing customers.
- G Necessary and reasonable legal expenses and professional fees.
- H Other Relevant Factors.



Appendix C  
Schedule 2  
Summary Value Results for Decertified CCN Parcels

Control No.	CCN W	CCN S	CCN Holder	Petitioner/Service Provider	Year	Price	Acres Decertified	Notes
44555		20694	Tall Timbers Utility Company, Inc.	Tyler Oak Creek Development, LLC/ City of Tyler	6/19/2015	\$ -	129.09	NewGen Valuation Report showed \$0 value.
45244	13201	21059	Aqua Texas, Inc	SLF IV-114 Assemblage, L.P./City of Fort Worth	12/10/2015	\$ -	1,102.00	NewGen preliminary value \$0
45292	11916	20629	Suetrak USA Company, Inc.	City of Fort Worth	1/7/2016	\$ -	1,102.00	NewGen Valuation Report showed \$0 value.
45450	13201		Aqua Texas, Inc	Smiley Road, Ltd./ Mustang Special Utility District's (Mustang SUD)	3/14/2016	\$ -	111.00	NewGen Valuation Report showed \$0 value. However, it stated if compensation was to be made it should be \$541.96.
45462	13201		Aqua Texas, Inc	Smiley Road, Ltd./ Mustang Special Utility District's (Mustang SUD)	3/14/2016	\$ -	899.00	NewGen Valuation Report showed \$0 value. However, it stated if compensation was to be made it should be \$4,340.54.
45702		20973	Green Valley Special Utility District	City of Cibolo	1/18/2018	\$ -	1,694.00	NewGen preliminary value \$0
45956		20973	Green Valley Special Utility District	City of Schertz	11/17/2017	\$ -	405.00	NewGen preliminary value \$0
46120	10908		Mountain Peak Special Utility District	City of Midlothian	11/17/2017	\$ -	97.70	Initial case was 44394.
46140	10456		Kempner Water Supply Corporation	City of Lampasas	8/10/2017	\$ -	149.00	No compensation due.
50077	13203	21065	Aqua Texas, Inc	Kristin Calfee Bybee	7/31/2020	\$ 4,250.00	25.60	No appraisal report. Only settlement agreement.
50109	13203	21065	Aqua Texas, Inc	Carol C. Van Alstyne	7/17/2020	\$ 4,000.00	25.30	NewGen Valuation Report showed \$0 value.
50258		20586	UA Holdings 1994-5, LP	Clay Road 628 Development, LP	6/18/2020	\$ -	194.00	NewGen Valuation Report showed \$0 value.
50260	13259		Simply Aquatics, Inc	Clay Road 628 Development, LP	7/29/2020	Confidential	5.50	No appraisal report. Confidential settlement amount.
50464		20694	Tall Timbers Utility Company, Inc.	Cooper Empire, LLC,	9/8/2020	\$ 32,000.00	27.00	No appraisal report. Only settlement agreement.
50495	20075		City of Lakewood Village	The Sanctuary Texas LLC	3/23/2021	\$ -	70.13	Kimley Horn Valuation Report showed \$0 value.
51044	10099		Rockett Special Utility District	FCS Lancaster, Ltd.	4/20/2021	\$ -	156.00	Willdan Financial Services preliminary value \$0.
51114	13202	21065	Aqua Texas, Inc	Imperial Heights, Ltd.	2/2/2021	\$ 8,500.00	36.40	No appraisal needed as settlement agreement between the 2 parties.
51150	10908		Mountain Peak Special Utility District	DJD Land Partners LLC	3/8/2021	Confidential	65.53	No appraisal report. Confidential settlement amount.
51163	13201		Aqua Texas, Inc	Olex (United States), Inc. fka Olex Corporation NV	4/29/2021	\$ 5,500.00	234.39	No appraisal report. Only settlement agreement.
51166	11978	20650	SWWC Utilities, Inc.	Colorado River Project, LLC	5/26/2021	\$ -	1,322.36	DGRA, Inc. appraisal only necessary and reasonable legal expenses and professional fees (estimate \$10,000).
51349		20465	Gulf Coast Waste Disposal Authority	David Speer and Kevin Speer	1/8/2021	\$ -	36.17	No appraisal report. No compensation due.
51352	12037		Crest Water Company	Carnegie Development, LLC	7/30/2021	\$ 3,000.00	195.47	No appraisal report. Only settlement agreement.
51367	10284		West Wise Special Utility District	Destiny Development, LLC, on behalf of Cyd Bailey	2/18/2021	Confidential	31.14	No appraisal report. Confidential settlement amount.
51400	12391		G&W Water Supply Company u	RCR Hempstead Rail, LP	6/16/2021	\$ 20,000.00	137.04	No appraisal report. Only settlement agreement.
51423	10294		Aqua Water Service Corporation	West Bastrop Village, Ltd	2/10/2021	\$ -	347.90	No appraisal report. No compensation due.
51455	12892		T&W Water Service Company	Clay Road 628 Development, LP	5/10/2021	Confidential	269.00	No appraisal report. Confidential settlement amount.
51492	13201		Aqua Texas, Inc.	Denton 114 LP	6/18/2021	\$ 3,000.00	90.55	No appraisal report. Only settlement agreement.
51595	10099		Rockett Special Utility District	Compass Datacenters DFW III, LLC	4/8/2022	\$ -	149.34	Willdan Financial Services preliminary value \$0. Rockett did not file an appraisal. No compensation due.
51698	12887		MSEC Enterprises, Inc.	Tri Pointe Homes Texas, Inc.	6/18/2021	\$ 7,327.00	125.08	No appraisal report. Only settlement agreement.
51799	10081		Johnson County Special Utility District	WUSF 5 Rock Creek East, LP and Walton Texas, LP	11/1/2021	\$ 20,000.00	833.00	No appraisal report. Only settlement agreement.
51824	11202		Town of Little Elm	Sam Hill Venture	8/24/2021	\$ -	14.50	Kimley-Horn Valuation Report showed \$0 value.
51842		21116	Aqua Texas, Inc.	Central Texas Airport, LLC, Hinsvark Family Trust	3/10/2022	\$ 4,800.00	269.69	No appraisal report. Only settlement agreement.

Appendix C  
Schedule 2  
Summary Value Results for Decertified CCN Parcels

Control No.	CCN W	CCN S	CCN Holder	Petitioner/Service Provider	Year	Price	Acres Decertified	Notes
51933	13038		C C Water Works, Inc.	Montgomery Estates, LLC	2/16/2022	\$ 11,435.00	98.90	Commission Appraiser NewGen Appraisal only necessary and reasonable professional fees.
51939		20465	Gulf Coast Authority	NPH Market Street, LLC	7/16/2021	\$ -	134.09	No appraisal report. No compensation due.
51973	10342		H-M-W Special Utility District	The Mohnke Living Trust, et al.	3/21/2022	\$ 648.00	99.00	Commission Appraiser B&D Environmental, Inc. only debt service and necessary and reasonable professional fees.
52004	13203		Aqua Texas, Inc.	DPSFLP Ltd.	11/5/2021	\$ 8,000.00	303.00	No appraisal report. Only settlement agreement.
52036	11844		New Progress Water Supply Corporation	Calhoun Acres, LP	9/24/2021	\$ -	150.00	No appraisal report. No compensation due.
52038	11029		Creedmoor-Maha Water Supply Corporation	Capital Land Investments I, LP	2/2/2022	\$ 45,000.00	350.67	No appraisal report. Only settlement agreement.
52090	11052		Dobbin Plantersville Water Supply Corporation	Redbird Development, LLC	4/11/2022	\$ -	388.50	NewGen Valuation Report showed \$18,482 value for debt service and necessary and reasonable professional fees. Commission ruled no compensation due.
52148	11615		City of Cut and Shoot	Stoecker Corp	9/15/2021	\$ -	29.99	No appraisal report. No compensation due.
52160	10081		Johnson County Special Utility District	Sewell Family Partnership	10/27/2021	\$ 75,000.00	293.50	No appraisal report. Only settlement agreement.
52256	11029		Creedmoor-Maha Water Supply Corporation	Gateway Oasis V LLC	11/17/2021	Confidential	397.00	No appraisal report. Only settlement agreement.
52336	11844		New Progress Water Supply Corporation	Calhoun Acres, LP	10/25/2021	\$ -	92.58	No appraisal report. No compensation due.
52474	10420		Polonia Water Supply Corporation	Neimann Farm Partners, LP	1/12/2022	\$ -	205.30	No appraisal report. No compensation due.
52566		20465	Gulf Coast Authority	Montgomery Estates, LLC	2/18/2022	\$ -	147.00	No appraisal report. No compensation due.
52621	10089		Bethesda Water Supply Corporation	Parks of Village Creek, LLC	2/3/2022	\$ 1,000.00	102.00	No appraisal report. Only settlement agreement.
52642	11612	20952	Quadvest, LP	CR Farms, LLC	3/3/2022	\$ -	64.21	No appraisal report. No compensation due.
52669	10089		Bethesda WSC	Watermark Infrastructure, LLC	5/26/2022	\$ -	43.00	CCN Holder did not file appraisal report. No compensation due.

# Appendix D

## Dan V. Jackson. M.B.A.

### Vice President and Principal in Charge

#### Education

Master of Business Administration,  
University of Chicago,  
1984;  
Specialization in Finance/Accounting

Bachelor of Arts,  
University of Chicago,  
1982; Major in Social Sciences  
Dean's Honor List

#### Areas of Expertise

Rate Design  
Cost of Service  
Financial Forecasting  
Valuation Analysis  
Acquisition Analysis  
Privatization Analysis  
Economic Impact Analysis  
Expert Witness Testimony

#### Affiliations

Member, American Water Works Association  
  
National Association for Business Economics

#### Other

*The Forgotten Men* (fiction) – Mediaguruz  
  
*Rainbow Bridge* – Fiction – Mirador Publishing

#### 36 Years' Experience

Mr. Jackson has 35 years of experience as an international financial expert, having completed more than 400 water, wastewater, electric, gas, solid waste and stormwater rate/cost of service studies and long-term financial plans for clients in the USA and the Pacific region. He also has served as an expert witness in state court, federal court and before several public utility commissions. Mr. Jackson's prior experience includes positions with Deloitte and Touche, Reed-Stowe & Company and Arthur Andersen. In 1997, Mr. Jackson co-founded Economists.com LLC, an international consulting firm with offices in Dallas and Portland, Oregon. Willdan acquired Economists.com in 2015, and Mr. Jackson now serves as Vice President and Managing Principal. Mr. Jackson has given dozens of lectures and presentations before professional associations. He is also an accomplished author; his award-winning novel **Rainbow Bridge** is now available in bookstores and on Amazon.com and bn.com.

His experience is summarized below.

#### Water/Wastewater – Rate Studies and Long-Term Financial Plans for which Mr. Jackson served as Project Manager

##### Dallas/Fort Worth

- Allen, TX 2007, 2009, 2012,2016
- Balch Springs, TX 2017,2021
- Cedar Hill, TX 2016, 2018
- Celina, TX 2014, 2018, 2019,2020,2021
- Coppell, TX 2017,2020,2021
- Denton County FWSD 1A, TX 2017
- Denton County FWSD 8C, TX 2018
- DeSoto, TX 2005 -- 2019
- Duncanville, TX 2002, 2003, 2007, 2013, 2014, 2018
- Fairview, TX 2016, 2018
- Ferris, TX 2020
- Frisco, TX 2017
- Garland, TX 2009 –2012
- Grand Prairie, TX 2019,2020
- Hackberry, TX 2006
- Heath, TX 2020
- Hutchins, TX 2017,2019
- Kaufman, TX 1994
- Little Elm, TX 2001, 2004,2008-2016
- McKinney, TX 2010, 2016, 2019
- Mesquite, TX 2018
- Midlothian, TX 2000, 2003, 2006, 2010 2016,2021
- Oak Point, TX 2006, 2011
- Parker, TX 2016
- Plano, TX 2017,2020
- Princeton, TX 2012
- Prosper, TX 2005, 2016, 2018
- Richardson, TX 2016
- Rowlett, TX 2009, 2017, 2019,2021

**D. Jackson**  
*Resume Continued*

- Royse City, TX 2007, 2011,2018
- Rockwall, TX 2018
- Sachse, TX 2014
- Sherman, TX 2021
- Venus, TX 2005, 2012
- Waxahachie, TX 2012
  
- State of Texas**
- Alamo Heights, TX 2018
- Amarillo, TX 2017
- Aqua Water Supply Corporation, TX 2003
- Brownsville PUB, TX 2020,2021
- Brady, TX 2016
- Castroville, TX 2016,2018
- Cibolo Creek Municipal Authority 2012, 2015
- Del Rio, TX 2020,2021
- Donna, TX 2007, 2011, 2012, 2013,2015-2020
- El Paso County WCID #4, TX 2005, 2007, 2010, 2011, 2015,2019
- El Paso County Tornillo WCID, TX 2006, 2010
- Galveston, TX 2020
- Groesbeck, TX 2001, 2004
- Harker Heights, TX 2006
- Hewitt, TX 2009 – 2015, 2021
- Hondo, TX 2019
- Jonah Special Utility District, TX 2006
- Kempner WSC, TX 2014-2015
- Laredo, TX 2018,2019
- Laguna Madre Water District, TX 1991-1999, 2005, 2014, 2018,2020
- La Villa, TX 2007
- Leander, TX 2017-2018, 2020,2021
- League City, TX 2019
- Liberty Hill, TX 2018,2019
- Los Fresnos, TX 2007,2017
- Marble Falls, TX 2020
- McLendon-Chisholm, TX 2019
- Mercedes, TX 2001, 2003
- New Braunfels, TX 2019
- North Fort Bend Water Authority, TX 2011, 2016,2020
- Paris, TX 1995
- Port Arthur, TX 2020
- Port of Houston Authority, TX 2001
- Primera, TX 2021
- Raymondville, TX 2001
- Robinson, TX 2012, 2014, 2015
- Robstown, TX 2014, 2015
- San Juan, TX 2019
- Schertz, TX 2012 – 2019
- Seguin, TX 2015 -- 2020
- Selma, TX 2018
- Schertz-Seguin Local Govt Corporation, TX 2009 – 2021
- Sonora, TX 2012
- Southmost Regional Water Authority, TX 2001

**D. Jackson**  
*Resume Continued*

- Tomball, TX 2018
- Troup, TX 2006
- Venus, TX 2005, 2012
- West Harris County Regional Water Auth, TX 2003, 2006, 2010, 2011, 2016
- Webb County, TX 2011
- Whitehouse, TX 2008
- Winona, TX 2009
- Yancey Water Supply Corporation, TX 2005

**Arizona**

- Bisbee, AZ 2000 – 2005, 2018
- Buckeye, AZ 2013, 2015, 2016
- Camp Verde Sanitary District, AZ 2006, 2008
- Carefree, AZ 2018
- Casa Grande, AZ 2009
- Chino Valley, AZ 2010-2018
- Chloride Domestic Water Imp District, AZ 2003
- Clarkdale, AZ 2005
- Clifton, AZ 2018
- Cottonwood, AZ 2004, 2007, 2009
- Douglas, AZ 2009, 2011
- Eagar, AZ 2006, 2011, 2012
- Eloy, AZ 2007, 2011-2013
- Florence, AZ 2008, 2012
- Flowing Wells Improvement District, AZ 2008
- Goodyear, AZ 2014, 2015, 2019-2020
- Holbrook, AZ 2004
- Jerome, AZ 2019
- Marana, AZ 2008 – 2013, 2016
- Miami, AZ 2010 – 2012, 2015
- Nogales, AZ 2011, 2015-2016, 2018
- Patagonia, AZ 1999, 2002
- Payson, AZ 2006, 2010, 2012-2014, 2019, 2020
- Prescott, AZ 2008
- Quartzsite, AZ 2004, 2009, 2011, 2012, 2018
- Queen Creek, AZ 2004, 2007, 2015, 2016
- Safford, AZ 2006
- San Luis, AZ 2002, 2012, 2013, 2017, 2018, 2021
- Show Low, AZ 2011, 2014
- Somerton, AZ 1999, 2002, 2005-2010, 2018
- Tombstone, AZ 2001
- Tonto Village DWID, AZ 2018
- Wellton, AZ 2003
- Willcox, AZ 2002
- Winslow, AZ 2016, 2018
- Yuma, AZ 2007, 2014, 2015, 2018

**USA**

- North Chicago, IL 2001, 2005
- Ada, OK 2014, 2015, 2018
- Altus, OK 2020
- Chickasha, OK 2016

**D. Jackson**  
*Resume Continued*

- Edmond, OK 2010, 2015,2017,2018
- Miami, OK 2009, 2014,2017
- Pryor, OK 2016
- Bryant, AR 2020
- Hot Springs, AR 2005, 2009-2020
- North Little Rock Wastewater Utility, AR 1999, 2003, 2006, 2011-2015
- Russellville, AR 2013,2014,2015,2019
- Sarpy County, NE 2018
- South Adams County WSD, CO 2013

**Solid Waste and Stormwater – Rate Studies and Long-Term Financial Plans**

- Balch Springs,TX 2021
- Coppell, TX 2020
- Duncanville, TX 2007
- Frisco, TX 2017
- Hewitt, TX 2010
- Mercedes, TX 1999
- San Luis, AZ 2003, 2013
- Somerton, AZ 2006
- San Marcos, TX 2018
- Goodyear, AZ 2020
- Hot Springs, AR 2011, 2012, 2013, 2016
- Miami, OK 2009

**Water/Wastewater –CCN/ System Valuations and Acquisitions**

- Avondale, AZ 2006
- Bullhead City, AZ 2020
- Buckeye, AZ 2013-2015
- Casa Grande, AZ (private) 2015
- Chino Valley, AZ 2006, 2016,2018
- Cottonwood, AZ 2009, 2012
- Clarksdale, AZ 2009
- Florence, AZ 2007, 2014
- Marana, AZ 2009, 2010
- Pine Strawberry Water Imp District, AZ 2009
- Prescott, AZ 2006
- Prescott Valley, AZ 1998
- Queen Creek, AZ 2008, 2011
- Show Low, AZ 2010, 2011
- Aubrey, TX 2015
- Arlington, TX 1999, 2001
- Celina, TX 2006, 2015
- Forney Lake WSC, TX 2016
- Gunter, TX 2006
- Kempner WSC, TX 2016
- FCS Lancaster,TX 2021
- Taylor, TX 1999

**D. Jackson**  
*Resume Continued*

- Whitehouse, TX 2006
- Van Alstyne, TX 2019
- Rockwall, TX 2005
- Trinity Water Reserve, TX 2000
- North Chicago, IL 2001
- North Little Rock WWU, AR 2015

**Water/Wastewater – Impact Fee Studies**

- East Medina County Special Utility District, TX 2000
- Cibolo Creek Municipal Authority, TX 2015
- Harlingen, TX 2005
- Laguna Madre Water District, TX 1993, 1996, 2000, 2003
- Liberty Hill, TX 2019
- Los Fresnos, TX 2006
- Mesquite, TX 1996
- Seguin, TX 2015,2020
- San Luis, AZ 2002
- Marana, AZ 2011- 2014
- Wellton, AZ 2003
- Prescott, AZ 2007
- Yuma, AZ 2004, 2007, 2016
- Hot Springs, AR 2005, 2009, 2016

**International Regulated Utilities – Pacific and Caribbean**

- Water Authority of Fiji 2016,2019
- Palau Public Utilities Corporation 2018
- Kiribati Public Utilities Board 2019,2020
- EPC, Independent State of Samoa 2013
- Commonwealth Utilities Corporation Saipan 2005-2021
- American Samoa Power Authority 2009,2014,2016
- Guam Power Authority 2011
- Virgin Islands Telephone Company 1990-1991

**Expert Witness Testimony**

**City of Arlington, TX** – Seven separate cost of service analyses and testimony in wholesale contract rate proceedings before TNRCC. Largest ongoing wastewater rate dispute in Texas history, 1990-1994.

**Cameron County Fresh Water Supply District No. 1 vs. Town of South Padre Island** (TNRCC Docket 30346-W) – Expert testimony on reasonableness of rate structure, 1992.

**Cameron County Fresh Water Supply District No. 1 vs. Sheraton Hotel/Outdoor Resorts** (TNRCC Docket 95-0432-UCR) – Expert testimony on reasonableness of rate structure, 1993.

**Laguna Madre Water District** (PUC Docket 49154) – Expert testimony on the reasonableness of the District’s raw water rate -- 2019.

**City of Celina, TX** (SOAH Docket 2003-0762-DIS) – Expert testimony on the proposed creation of a Municipal Utility District, 2004.



**D. Jackson**  
*Resume Continued*

**City of Celina, TX (PUC Docket No. 49225)** – Expert testimony on the reasonableness of outside city limit rates – 2020.

**East Medina County Special Utility District (SOAH Docket 582-02-1255)** – Expert testimony on CCN application, 2003.

**East Medina County Special Utility District (SOAH Docket 582-04-1012)** – Expert testimony on CCN application, 2004.

**City of Karnes City, TX** – Expert testimony on valuation of CCN before the Texas Commission on Environmental Quality, 2009.

**City of Princeton, TX (SOAH Docket 582-06-1641 and TCEQ Docket 2006-0044-UCR)** – Expert testimony on ability to serve proposed service territory, 2007.

**Town of Little Elm, TX (SOAH Docket 582-01-1618)** – Expert testimony on reasonableness of rate structure, 2001.

**Schertz Seguin Local Government Corporation** – Expert testimony addressing application of San Antonio Water System for groundwater permits for Gonzalez County UWCD, 2009.

**City of Ruidoso, NM** – Expert testimony on reasonableness of Wastewater Rates, 2010.

**City of Hot Springs, AR** – Expert witness testimony on Reasonableness of Stormwater Rates, 2010.

**Dallas County Water Control and Improvement District No. 6 (TNRCC Docket 95-0295-MWD)** – Hearing on the merits for proposed wastewater treatment plant permit, 1995.

**Commonwealth Utilities Corporation Saipan** -- Expert testimony before Commonwealth Public Utilities Commission on reasonableness of rate structure, 2010-2015.

**City of Mesquite, Texas vs. Southwestern Bell Telephone Company (No. 3-89-0115-T, U.S. Federal Court Northern Texas)** -- 18 year estimate of revenues excluded from municipal franchise fees by SWB. Expert testimony on SWB accounting and franchise policies and Discovery disputes, 1991-1995.

**City of Port Arthur, et. al., vs. Southwestern Bell Telephone Company (No. D-142,176, 136th Judicial District Court of Beaumont, Texas)** -- 20 year estimate of revenues excluded from municipal franchise fees by SWB. Expert testimony on SWB accounting and franchise policies. 1993-1995.

**Southwestern Bell Telephone Company vs. City of Arlington, Texas (No. 3:98-CV-0844-X, U.S. Federal Court Northern Texas)** -- 15 year estimate of access revenues excluded from municipal franchise fees by SWB. Expert testimony on SWB accounting and franchise policies, 1996.

**Metro-Link Telecom vs. Southwestern Bell Telephone Company (No. 89-CV-0240, 56th Judicial District Court Galveston County Texas)** -- 20 year pro forma model calculating lost revenue from the cancellation of a trunk line leasing contract.

**Complaint of the City of Denton against GTE Southwest, Inc. (PUC Docket 14152), 1994.**

**GTE vs. City of Denton (No. 95-50259-367, 367th Judicial District Court of Denton County, Texas)** -- 10 year estimate of revenues excluded from municipal franchise fees by GTE, 1994-1996.

**MAS vs. City of Denton, Texas (No. 99-50263-367, Judicial District Court of Denton County, Texas)** – Testimony on reasonableness of franchise fee payment calculations.

#### **Water/Wastewater – Other Studies**

**City of Paris, TX** – Campbell’s Soup Co. wholesale contract review/negotiations.

**City of Conroe, TX** – Evaluation of proposed long-term wholesale contract.

**Cities of Bellmead, Woodway and Hewitt, TX** – Least cost alternative analysis and assistance with

wholesale contract negotiations with City of Waco.

**City of Lubbock, TX** – Analysis of reasonableness of rates for Franklin Water System, January 2002.

**City of Rockwall, TX** – Wholesale contract review, 2005.

**City of Miami, OK** – Non-rate revenue study, 2010.

**Town of Payson, AZ** – Financial feasibility and economic impact study of C.C. Cragin Reservoir, 2011.

**City of Duncanville, TX** – Water and wastewater cost allocation study, 2002.

**City of Whitehouse, TX** – Economic analysis of potential acquisition of a water supply corporation, 2006.

**City of Midlothian, TX** – Drought management plans, 2001.

**City of Midlothian, TX** – Assistance with wholesale contract negotiations, 2000-2001.

**City of Arlington, TX** – Cost of service study for non water/sewer revenues, 1997.

**City of Arlington, TX** – Lease vs. purchase analysis of city fixed assets, 1998.

**City of Donna, TX** – Water and wastewater affordability analysis, 2005.

**Southmost Regional Water Authority** – Economic and financial impact of proposed desalination treatment plant, 2001.

**Texas Water Development Board Region M** – Financial feasibility analysis of water resource alternatives, 2006.

**Laguna Madre Water District** – Lost/unaccounted for water study, 1992.

**Schertz Seguin Local Government Corporation** – Assistance in contract negotiations with SAWS, 2010.

**California-American Water Company** – Reasonableness of rate structure for City of Thousand Oaks, 2003.

**California-American Water Company** – Reasonableness of rate structure for City of Felton, 2004.

**Forsyth County, GA** – Business plan with extensive recommendations for managing unprecedented growth in volume and customer connections. Ten-year projection of operating income, 1998.

**City of Lakeland, FL** – Valuation of wastewater reuse alternatives over 20-year timeframe.

**Border Environment Cooperation Commission and City of Bisbee, AZ** – Wastewater system improvements plan, 2003.

**Water Infrastructure Finance Authority of Arizona** – Evaluation of 40-year wastewater construction financing plan for Lake Havasu City, 2002.

**Water Infrastructure Finance Authority of Arizona** – Comprehensive residential water and wastewater rate survey for the state of Arizona, 2004-2008.

**City of Plano, TX** – evaluation of long-term contract with North Texas Municipal Water District, 2015-2020.

#### **Regulated Utilities – USA**

**City of Miami, OK** – Electric, water and wastewater and electric rate study, 2006.

**Bonneville Power Administration** ---Participation in Average System Cost (ASC) program, including proposed changes in ASC methodology, 1988-1990.

**Houston Lighting & Power** -- Feasibility/Prudence analysis of South Texas Nuclear Project vs. alternate forms of energy. Analysis formed the basis of partner's expert testimony before the Public Utility Commission of Texas, 1988.

**Kansas Power & Light** – Analysis of proposed merger with two separate companies, 1988.

**Greenville Electric Utility System-** Development of short-term cash investment policy in accordance with state law, 1989.

**Horizon Communications**– Business plan development, 2000.

**City of Mercedes, TX** – Economic Impact of New City Projects, 2000.

#### **Telecommunications**

**City of Dallas, TX** – Forecast of economic and financial construction and non-construction damages resulting from franchise’s failure to fulfill terms of agreement, 2004

**City of Dallas, TX** ---Financial evaluation and forecast of alternative wireless services contracts, 2005.

**City of Dallas, TX** --Evaluation and advice concerning VOIP contract with SBC, 2003

**Voice Web Corporation**-- Financial forecast and strategic plan for CLEC development, 2001

**United Telephone of Ohio** -- Pro forma forecast model forecasting the impact on financial statements of proposed changes in state telecommunications regulatory structures. Model was used as the basis for privatization bids for Argentine and Puerto Rican Telephone Companies, 1988.

**Bonneville Power Administration** – Evaluation and financial forecast of long-term fiber optic leasing operation, 1999.

**Bonneville Power Administration** – Economics of Fiber Analysis, 1999.

**City of Portland, Oregon** –Municipal Franchise Fee Review, 2000.

**US West, Inc.** – Valuation study and financial forecast of headquarters operation. Used as basis for Partner’s allocated cost testimony before the Public Utility Commission in Washington and Utah.

**Star-Tel** -- Estimate of revenues lost due to rival’s unfair business practices, 1995.

**Cities of Denton and Carrollton, Texas** -- Review of municipal franchise fee payments by GTE, 1994-1996.

**Winstar Gateway Network** -- forecast of average lifespan per ANI for specific customer classes.

**Advisory Commission on State Emergency Communications** -- Review of E911 Equalization Surcharge Payments by AT&T, ATC Satelco, and Lake Dallas Telephone Company.

**Northern Telecom** -- Projection of potential revenue generated from the long-term lease of DMS-100 switching units to Pacific Bell.

#### **Publications/Presentations/Seminars**

- ***The Forgotten Men (fiction)*** – Mediaguruz Publishing, 2012.
- ***Rainbow Bridge (fiction)*** – Mirador Publishing, 2020. Winner, 2021 Feathered Quill Silver Award for Animal-based literature.
- ***Raising Water and Wastewater Rates – How to Maximize Revenues and Minimize Headaches*** – Arizona Small Utilities Association, August 2002; Texas Section AWWA, April 2003
- ***Wholesale Providers and the Duty to Serve: A Case Study*** – Water Environment Federation, September 1996.
- ***Lease vs. Purchase – A Guideline for the Public Sector*** – Texas Town and City, March 1998•.
- ***An Introduction to Lease vs. Purchase*** – Texas City Managers Association – May 1998.
- ***Technische Universiteit Delft*** – Delft Netherlands -- Annual Infrastructure Conference – May 2000, 2001.
- ***The US Water Industry – A Study in the Limits of Privatization*** -- Technische Universiteit Delft – Delft Netherlands – March 2007.

**D. Jackson**  
*Resume Continued*

- *The New Information Economy: Opportunity or Threat to the Rio Grande Valley?* – Rio Grande Valley Economic Summit -- Oct 2000.
- *The Financial Benefits of Regionalization – A Case Study* – Texas Water Development Symposium – September 2010.
- *Developing Conservation Water Rates Without Sacrificing Revenue* – TWCA Conference, San Antonio Texas, October 2012.
- *Water Rates – Challenges for Pacific Utilities* – Pacific Water and Wastes Conference, American Samoa, September 2014.