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PUC DOCKET NO. 52655

PETITION OF McCART ST, LLC	§	BEFORE THE PUBLIC UTILITY
TO AMEND BOLIVAR WATER	§	
SUPPLY CORPORATION'S	§	
CERTIFICATE OF CONVENIENCE	§	COMMISSION OF TEXAS
AND NECESSITY IN DENTON	§	
COUNTY BY EXPEDEITED	§	
RELEASE	§	

PETITIONER'S FIRST REQUESTS FOR INFORMATION

To: Bolivar Water Supply Corporation by and through their attorney of record Arturo D. Rodriguez, Russell Rodriguez Hyde Bullock LLP, 1633 Williams Drive, Building 2, Suite 200 Georgetown, Texas 78628

Pursuant to 16 Texas Administrative Code (TAC) § 22.144 of the Commission's Procedural Rules, McCart St, LLC ("McCart" or "Petitioner") requests that Bolivar Water Supply Corporation ("Bolivar") by and through their attorneys of record, provide the following information and answer the following question(s) under oath. The question(s) shall be answered in sufficient detail to fully present all the relevant facts, within the time limit provided by the Presiding Officer or within 20 days, if the Presiding Officer has not provided a time limit. Please copy the question immediately above the answer to each question. These question(s) are continuing in nature, and if there is a relevant change in circumstances, submit an amended answer, under oath, as a supplement to your original answer. State the name of the witness in this cause who will sponsor the answer to the question and can vouch for the truth of the answer.

Dated: April 13, 2022

Respectfully submitted,

/s/ David Tuckfield

ANDY BARRETT & ASSOCIATES, PLLC

Andrew N. Barrett

State Bar No. 01808900

3300 Bee Cave Road, Suite 650 #189

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**MCCART ST, LLC'S
FIRST REQUEST FOR INFORMATION TO
BOLIVAR WATER SUPPLY CORPORATION**

Austin, Texas 78746
512-600-3800
512-330-0499 FAX

THE AL LAW GROUP, PLLC
David J. Tuckfield
12400 Highway 71 West
Suite 350-150
Austin, TX 78738
(512) 576-2481
(512) 366-9949 Facsimile
david@allawgp.com

ATTORNEYS FOR PETITIONER
MCCART ST, LLC

CERTIFICATE OF SERVICE

I certify that, unless otherwise ordered by the presiding officer, notice of the filing of this document was provided to all parties of record on April 13, 2022 in accordance with the Order Suspending Rules filed in Project No. 50664.

/s/ David Tuckfield
David J. Tuckfield

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**MCCART ST, LLC'S
FIRST REQUEST FOR INFORMATION TO
BOLIVAR WATER SUPPLY CORPORATION**

DEFINITIONS

- 1) "Bolivar Water Supply Corporation" or "Bolivar WSC" or "you" or "your" refers to the Bolivar Water Supply Corporation and any person acting or purporting to act on its behalf, including without limitation, attorneys, agents, advisors, investigators, representatives, employees or other persons.
- 2) "McCart Tract of Land" refers to the 251-acre tract of land that has been released from Bolivar WSC's Certificate of Convenience and Necessity Water CCN No. 11257 pursuant to the Order from the Commission signed April 4, 2022 in PUC Docket 52655.
- 3) "Document" includes any written, recorded, or graphic matter, however produced or reproduced, including but not limited to correspondence, telegrams, contracts, agreements, notes in any form, memoranda, diaries, voice recording tapes, microfilms, pictures, computer media, work papers, calendars, minutes of meetings or other writings or graphic matter, including copies containing marginal notes or variations of any of the foregoing, now or previously in your possession. In the event any documents requested by this Request for Information have been transferred beyond your control, describe the circumstances under which the document was destroyed or transferred and provide an exact citation to the subject document. In the event that documents containing the exact information do not exist, but documents do exist which contain portions of the required information, or which contain substantially similar information, then the definition of "documents" shall include the documents which do exist, and these documents will be provided.

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**MCCART ST, LLC'S
FIRST REQUEST FOR INFORMATION TO
BOLIVAR WATER SUPPLY CORPORATION**

INSTRUCTIONS

- 1) Pursuant to 16 TAC § 22.144(c)(2), Petitioner requests that answers to the requests for information be made under oath.
- 2) Please copy the question immediately above the answer to each question. State the name of the witness in this cause who will sponsor the answer to the question and can vouch for the truth of the answer.
- 3) These questions are continuing in nature, and if there is a relevant change in circumstances, submit an amended answer, under oath, as a supplement to your original answer.
- 4) Words used in the plural shall also be taken to mean and include the singular. Words used in the singular shall also be taken to mean and include the plural.
- 5) The present tense shall be construed to include the past tense, and the past tense shall be construed to include the present tense.
- 6) If any document is withheld under any claim of privilege, please furnish a list identifying each document for which a privilege is claimed, together with the following information: date, sender, recipients or copies, subject matter of the document, and the basis upon which such privilege is claimed.
- 7) Pursuant to 16 TAC § 22.144(h)(4), if the response to any request is voluminous, please provide a detailed index of the voluminous material.
- 8) Petitioner requests that each item of information be made available as it is completed, rather than upon completion of all information requested.

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**MCCART ST, LLC'S
FIRST REQUEST FOR INFORMATION TO
BOLIVAR WATER SUPPLY CORPORATION**

REQUESTS

1. Please provide copies of the audited financial statements (Annual Reports) for Bolivar WSC for the prior two (2) years.
2. Please provide a copy of the detailed revenue and expense budget for Bolivar WSC for the current fiscal year.
3. Please provide the current 10-Year Capital Improvement Plan for Bolivar WSC as well as detail for each of the projects identified in the plan including if it is for repairs and maintenance, growth related, etc.
4. Please provide a current map of the existing Bolivar WSC facilities that includes a map of the existing water distribution system and location, size, and types of all storage facilities on Bolivar WSC's system.
5. Please provide the current asset listing for Bolivar WSC including description, original cost, and year in service. For treatment plant assets, please identify current treatment capacities for each asset/plant.
6. Please provide a detailed listing and valuation of all of the Bolivar WSC's assets developed and currently existing for the express purpose of providing service to the parcel owned by McCart St, LLC in Denton County, Texas, which is the subject of this Petition for Expedited Release.
7. Please provide information on any outstanding debt obligations of Bolivar WSC including debt service schedules and uses of funds (i.e. asset maintenance, construction, design, etc.).
8. Please provide current growth projections for Bolivar WSC including both customer projections and demand needs. Please provide projections for a minimum of five (5) years.
9. Please provide a current customer count as well as historical usage by year for the previous five (5) years. Please provide a breakdown by customer class, if available.
10. Please provide water billed revenues by identified customer class by month from January 2017 to present.
11. Please provide water consumption by identified customer class by month from January 2017 to the present.

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**MCCART ST, LLC'S
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12. Please provide water active accounts by identified customer class by month from January 2017 to the present.
13. Please provide a copy of Bolivar WSC's current water rate schedule, and a schedule of all non-rate fees.