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PUC DOCKET NO. 52698

PETITION OF CROSSLAND	§	BEFORE THE
CONSTRUCTION COMPANY, INC. TO	§	
AMEND BOLIVAR WATER SUPPLY	§	
CORPORATION'S CERTIFICATE	§	PUBLIC UTILITY COMMISSION
OF CONVENIENCE AND NECESSITY	§	
IN DENTON COUNTY BY	§	
EXPEDITED RELEASE	§	OF TEXAS

**CROSSLAND CONSTRUCTION COMPANY, INC.'S FIRST
REQUEST FOR INFORMATION TO BOLIVAR WATER SUPPLY CORPORATION**

Pursuant to 16 Tex. Admin. Code § 22.144, Crossland Construction Company, Inc. ("Petitioner") hereby files its First Requests for Information ("RFIs") to Bolivar Water Supply Corporation ("Bolivar"). Responses to the RFIs set forth in Exhibit "A" hereto should be served on the following persons at the address indicated below within 20 days of service hereof.

Leonard H. Dougal
Alicia French
Jackson Walker LLP
100 Congress Avenue, Suite 1100
Austin, Texas 78701
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afrench@jw.com

Exhibit "A" is attached hereto and incorporated herein for all purposes.

DEFINITIONS

1. "Bolivar" refers to Bolivar Water Supply Corporation, its officers, employees, consultants, agents, attorneys, and affiliates to the extent such persons are acting for or on behalf of Bolivar Water Supply Corporation.
2. "CCN" refers to Bolivar's Certificate of Convenience and Necessity No. 11257.
3. "Subject Area" means the area in Denton County that is identified as the "Property" in the Petition for Streamlined Expedited Release filed in this docket.
4. "Document" and/or "documents" refers to all written, recorded, or graphic material within the scope of Rule 192 of the Texas Rules of Civil Procedure, however produced or

reproduced. Without limiting the foregoing, the terms include the following: agreements, contracts, communications, correspondence, letters, faxes, e-mail, instant message records, text message records, memoranda, records, reports, summaries, records of telephone conversations, diary entries, meeting minutes, calendars, appointment books, drafts, notes, telephone bills or records, bills, statements, records of obligations and expenditures, invoices, lists, journals, receipts, checks, canceled checks, letters of credit, envelopes, or folders, voice recordings, photographs, electronic data, electronic media, and any other data or information that exists in written, electronic, or magnetic form.

5. “Communication” refers to any oral or written utterance, notation, or statement of any nature whatsoever, by or to whomsoever made, and every manner or means of disclosure, transfer, or exchange of information, whether orally or by document, whether in person, in writing, by telephone, by cell phone, or otherwise, including, but not limited to: correspondence, conversation, dialogues, discussions, interviews, consultations, agreements, telegrams, telexes, texts, cables, memorandum, electronic mail, hand-deliveries, facsimile, or other understandings and exchanges of ideas or information between two or more persons.

6. “Relate to,” “related to,” or “relating to” means concerning, relating to, referring to, having a relationship with or to, pertaining to, identifying, describing, explaining, summarizing, or to be otherwise factually, legally or logistically connected to the subject matter of the particular request.

7. “Identify” or “identification” means:

a. When used in reference to a natural person, that you should state that person’s full name, address, and telephone number.

b. When used with respect to a “document,” “that you should state the date, subject and substance, author, type of document (e.g., letter, telegram, memorandum, computer printout, sound reproduction, chart, photograph, film, etc.), its present location and the identity of each of its present custodians and shall include all documents including those that you may claim are privileged. If any document was, but no longer is, in your possession or subject to your control, state whether it is (a) missing or lost; (b) was destroyed; (c) was transferred voluntarily or involuntarily to others; or (d) otherwise disposed of, and in each such instance explain the circumstances surrounding any authorization for such disposition.

c. When used in respect to any meeting or conversation, that you should state the date and specific location of the meeting or conversation plus the “identification” of all persons present, attending, participating, witnesses or having knowledge of the meeting or conversations.

d. When used in respect to an occurrence, event, or happening, that you should describe in detail what occurred or transpired at the occurrence, event or happening; the date, specific location, and duration of the occurrence, event, or happening; and “identify” all persons present, attending, participating, witnessing, or having knowledge of the occurrence, event, or happening.

- e. When used in respect to a statement, that you should state the substance of the statement, the date and specific location of the statement, and “identify” all persons present, witnessing, making or having knowledge of the statement.

INSTRUCTIONS

1. Your responses should conform to the Texas Rules of Civil Procedure and/or the rules of procedure of the Public Utility Commission of Texas.
2. Each document that is made available for review in response to these RFIs shall be produced as it is kept in the usual course of business (i.e., in the file folder or binder in which the documents were located when the request was served) or the documents shall be organized or labeled to correspond to the category of documents requested.
3. If the documents requested herein include electronic data and magnetic data, they shall be produced in their native format with all metadata intact.
4. When answering these RFIs, you are requested to furnish all information available to you, including information in the possession of your attorneys, investigators, consultants, employees, agents, representatives, or any other person acting on your behalf, and not merely such information as is held or known by you personally.
5. In the event any document or other thing referred to in these RFIs is not in your possession, custody, or control, specify what disposition was made of it and identify the person or entity who now has possession, custody, or control of the document or thing.
6. If you withhold any requested documents or information—including redactions of portions of documents—pursuant to an applicable privilege, provide a privilege log describing the documents, communications, or things withheld or redacted with sufficient specificity that the applicability of the privilege or protection may be assessed. See Tex. R. Civ. P. 193.3.
7. PLEASE TAKE FURTHER NOTICE that these RFIs are continuing in nature. Your answers and responses must include all documents that are currently in your possession, custody, and control and that come into your possession, custody, or control in the future.

Respectfully submitted,

JACKSON WALKER L.L.P.



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ATTORNEYS FOR CROSSLAND
CONSTRUCTION COMPANY, INC.

CERTIFICATE OF SERVICE

I certify that notice of the filing of this document was provided to all parties of record via electronic mail and facsimile on May 31, 2022, in accordance with the Order Suspending Rules, issued in Project No. 50664.



Leonard H. Dougal

EXHIBIT “A”

REQUESTS FOR INFORMATION

RFI 1-1. Please provide copies of Bolivar's audited financial statements, comprehensive annual financial report, and Annual Financial Statements for the previous three years. If audited financials are unavailable, please provide Fiscal Year ended Balance Sheets, Income Statements, and Statements of Cash flow for the indicated period.

RFI 1-2. Please provide Bolivar's current budget for Fiscal Year 2022 and the budget applicable for Fiscal Year 2021.

RFI 1-3. Please provide any and all copies of engineering reports, maps, drawing, plans and specifications, construction documents, cost projections and/or any other documents that identify improvements that are currently in-place and operational located within the Subject Area.

RFI 1-4. Please provide copies of any and all of Bolivar's contracts related to the purchase or sale of treated or raw water that are allocable to the Subject Area or Bolivar's CCN.

RFI 1-5. Please provide a map showing the Subject Area in relation to the remaining portions of the Bolivar System. On the map, please indicate all assets owned by Bolivar that are allocable to the Subject Area.

RFI 1-6. Please provide a list and valuation of Bolivar's assets within the Subject Area.

RFI 1-7. Please identify any portions of the assets in response to request 1-5 or 1-6 that were funded by debt that is still outstanding.

RFI 1-8. Please list any and all assets associated within the Subject Area rendered useless or valueless as a result of the decertification in this docket.

RFI 1-9. Please provide Bolivar's currently applicable capital improvement plan and its most recently completed master plan.

RFI 1-10. Please provide any and all documents concerning Bolivar's expenses related to the planning, design, or construction of water facilities that are allocable, in the opinion of Bolivar, to the Subject Area.

RFI 1-11. Please provide a copy of Bolivar's current tariff, including a schedule of all rates, fees, and charges.

RFI 1-12. Please state the amount of compensation to which Bolivar is entitled as a result of the expedited release of the Subject Area from Bolivar's CCN, in the opinion of Bolivar.

RFI 1-13. Please list all active connections on Bolivar's system by meter size.

RFI 1-14. Please provide water consumption by customer class by month from May 2019 to the present.

RFI 1-15. Please provide current projections of future growth for Bolivar, including both customer account projections and demand needs. Please provide projections for a minimum of 5 years.