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**SOAH DOCKET NO. 473-22-1659.WS
PUC DOCKET NO. 52758**

PETITION OF MCALLEN PUBLIC	§	BEFORE THE STATE OFFICE
UTILITY APPEALING WHOLESALE	§	
WATER RATE CHARGED BY	§	OF
HIDALGO COUNTY WATER	§	
IMPROVEMENT DISTRICT NO. 3	§	ADMINISTRATIVE HEARINGS

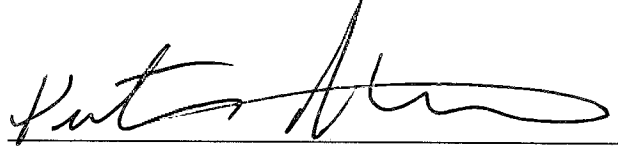
**HIDALGO COUNTY WATER IMPROVEMENT DISTRICT NO. 3'S
SUPPLEMENTAL RESPONSE TO MCALLEN PUBLIC UTILITY'S FIRST REQUESTS
FOR INFORMATION AND FIRST REQUESTS FOR ADMISSION**

Hidalgo County Water Improvement District No. 3 files this Supplemental Response to McAllen Public Utility's First Requests for Information, Questions 1.14 and 1.55. All Parties may treat the answers as if they were filed under oath.

Hidalgo County Water Improvement District No. 3 files these supplemental responses without agreeing to the relevancy of the information sought and without waiving their right to object at the time of the hearing to the admissibility of information produced herein. Responsive documents are being produced electronically through a dedicated Sharefile site and, with the service of this Response, the requesting party will receive an email providing instructions on how they may access the responsive documents electronically.¹ Access to documents designated as Confidential or Highly Sensitive will be provided only upon execution and delivery of a Protective Order certification by the requesting parties, and access to such documents will be governed by the terms of the Protective Order.

¹ Any other parties wishing access to the documents may contact the undersigned counsel to obtain such access.

Respectfully submitted,



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Attorneys for the Water Improvement District

CERTIFICATE OF SERVICE

I hereby certify that, unless otherwise ordered by the presiding officer, notice of the filing of this document was provided to all parties of record via electronic mail on April 1, 2022.



Heath D. Armstrong

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SUPPLEMENTAL RESPONSE TO MCALLEN PUBLIC UTILITY'S FIRST REQUESTS
FOR INFORMATION AND FIRST REQUESTS FOR ADMISSION**

MPU RFI 1.14 Please produce documents and records maintained by the District that relate to volumes of water delivered to individual customers by customer annually since January 1, 2017.

RESPONSE: This response is subject to a pending objection. Pursuant to and without waiving this objection, please refer to documents produced in response to MPU RFI 1.13.

**SUPPLEMENTAL
RESPONSE:** This supplemental response is subject to a pending objection. Pursuant to and without waiving this objection, the Water Improvement District is producing supplemental responsive documents.

Responsible Person: Othal Brand, Jr.

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**HIDALGO COUNTY WATER IMPROVEMENT DISTRICT NO. 3'S
RESPONSE TO MCALLEN PUBLIC UTILITY'S FIRST REQUESTS FOR
INFORMATION AND FIRST REQUESTS FOR ADMISSION**

MPU RFI 1.55 Please identify all changes to the rates charged by the District for supply or delivery of water for any non-municipal purpose, including irrigation, since January 1, 2012. Produce related documents, including any Board resolution adopting or implementing such rates.

RESPONSE: This response is subject to a pending objection. Pursuant to and without waiving this objection, please refer to documents produced in response to MPU RFI 1.4.

**SUPPLEMENTAL
RESPONSE:**

This supplemental response is subject to a pending objection. Pursuant to and without waiving this objection, the Water Improvement District is producing supplemental responsive documents.

Responsible Person: Othal Brand, Jr.

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PETITION OF MCALLEN PUBLIC UTILITY APPEALING WHOLESALE WATER RATE CHARGED BY HIDALGO COUNTY WATER IMPROVEMENT DISTRICT NO. 3	§ § § § §	BEFORE THE STATE OFFICE OF ADMINISTRATIVE HEARINGS
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**HIDALGO COUNTY WATER IMPROVEMENT DISTRICT NO. 3'S
RESPONSE TO MCALLEN PUBLIC UTILITY'S FIRST REQUESTS FOR
INFORMATION AND FIRST REQUESTS FOR ADMISSION**

INDEX OF VOLUMINOUS DOCUMENTS

1. RFI 1.-14:
 - 01.01.17-12.30.17 McAllen Country Club Water Receipt; PDF Document, 16 pages (Bates Number: Water Improvement District_001050-001065)
 - 01.03.17-12.29.17 Hidalgo County Irrigation District #3 Water Receipt; PDF Document, 15 pages (Bates Number: Water Improvement District_001066-001080)
 - 01.04.19-12.31.19 Hidalgo County Irrigation District #3 Water Receipt; PDF Document, 15 pages (Bates Number: Water Improvement District_001081-001095)
 - 01.05.21-12.30.21 Hidalgo County Irrigation District #3 Water Receipt; PDF Document, 12 pages (Bates Number: Water Improvement District_001096-001107)
 - 01.06.20-12.30.20 Hidalgo County Irrigation District #3 Water Receipt; PDF Document, 14 pages (Bates Number: Water Improvement District_001108-001121)
 - 01.09.18-12.28.18 Hidalgo County Irrigation District #3 Water Receipt; PDF Document, 12 pages (Bates Number: Water Improvement District_001122-001133)
 - 01.11.22-03.24.22 Hidalgo County Irrigation District #3 Water Receipt; PDF Document, 3 pages (Bates Number: Water Improvement District_001134-001136)
 - 01.31.21-12.24.21 McAllen Country Club Water Receipt; PDF Document, 14 pages (Bates Number: Water Improvement District_001137-001150)
 - 11.26.17-02.26.22 Morris Independent School District Water Receipt; PDF Document, 56 pages (Bates Number: Water Improvement District_001151-001206)

- 12.26.21-03.26.22 McAllen Country Club Water Receipt; PDF Document, 4 pages (Bates Number: Water Improvement District_001207-001210)
- 12.27.20-12.25.21 US Fish and Wildlife Refuge Water Receipt; PDF Document, 15 pages (Bates Number: Water Improvement District_001211-001225)
- 12.29.19-12.26.19 McAllen Country Club Water Receipt; PDF Document, 16 pages (Bates Number: Water Improvement District_001226-001241)
- 12.30.18-08.28.19 Southmost Farms Water Receipt; PDF Document, 13 pages (Bates Number: Water Improvement District_001242-001254)
- 12.30.18-12.28.19 McAllen Country Club Water Receipt; PDF Document, 16 pages (Bates Number: Water Improvement District_001255-001270)
- City of McAllen's Calendar Year 2017-2022 Water Receipts; PDF Document, 6 pages (Bates Number: Water Improvement District_001271-001276)
- 12.31.17-12.29.18 McAllen Country Club Water Receipt; PDF Document, 16 pages (Bates Number: Water Improvement District_001277-001292)
- 12.31.17-01.27.18 US Fish and Wildlife Refuge Water Receipt; PDF Document, 14 pages (Bates Number: Water Improvement District_001293-001306)