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DOCKET NO. 52883

RICHARD T. LEE'S APPEAL OF THE	§	PUBLIC UTILITY COMMISSION
COST OF OBTAINING SERVICE	§	
FROM AQUA WATER SUPPLY	§	OF TEXAS
CORPORATION	§	

**COMMISSION STAFF'S FIRST REQUEST FOR INFORMATION
TO AQUA WATER SUPPLY CORPORATION
QUESTION NOS. STAFF 1-1 THROUGH STAFF 1-11**

Pursuant to 16 Texas Administrative Code (TAC) § 22.144 of the Commission's Procedural Rules, the Staff of the Public Utility Commission of Texas (Staff) requests that Aqua Water Supply Corporation, by and through its 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 of the relevant facts, within the time limit provided by the Presiding Officer or within 20 days, if the Presiding Officer has not provided a time limit. Please copy the question immediately above the answer to each question. These question(s) are continuing in nature, and if there is a relevant change in circumstances, submit an amended answer, under oath, as a supplement to your original answer. State the name of the witness in this cause who will sponsor the answer to the question and can vouch for the truth of the answer.

Provide responses to the Requests for Information by filing with the Commission solely through the Interchange on the Commission's website and provide notice, by email, to all other parties that the pleading or document has been filed with the Commission, unless otherwise ordered by the presiding officer pursuant to the Order Suspending Rules in Project No. 50664.

Dated: December 23, 2021

Respectfully submitted,

**PUBLIC UTILITY COMMISSION OF TEXAS
LEGAL DIVISION**

Rachelle Nicolette Robles
Division Director

/s/ Anthony Kanalas
Anthony Kanalas
State Bar No. 24125640
1701 N. Congress Avenue
P.O. Box 13326
Austin, Texas 78711-3326
(512) 936-7459
(512) 936-7268 (facsimile)
Anthony.Kanalas@puc.texas.gov

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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 via electronic mail on December 23, 2021, in accordance with the Order Suspending Rules, issued in Project No. 50664.

/s/ Anthony Kanalas
Anthony Kanalas

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**COMMISSION STAFF'S FIRST REQUEST FOR INFORMATION
TO AQUA WATER SUPPLY CORPORATION
QUESTION NOS. STAFF 1-1 THROUGH STAFF 1-11**

DEFINITIONS

- 1) "Aqua WSC," "the Company," or "you" refers to Aqua Water Supply Corporation and any person acting or purporting to act on their behalf, including without limitation, attorneys, agents, advisors, investigators, representatives, employees, or other persons.
- 2) "Document" includes any written, recorded, or graphic matter, however produced or reproduced, including but not limited to correspondence, telegrams, contracts, agreements, notes in any form, memoranda, diaries, voice recording tapes, microfilms, pictures, computer media, work papers, calendars, minutes of meetings or other writings or graphic matter, including copies containing marginal notes or variations of any of the foregoing, now or previously in your possession. In the event any documents requested by this Request for Information have been transferred beyond Aqua WSC's control, describe the circumstances under which the document was destroyed or transferred, and provide an exact citation to the subject document. In the event that documents containing the exact information do not exist, but documents do exist which contain portions of the required information or which contain substantially similar information, then the definition of "documents" shall include the documents which do exist, and these documents will be provided.

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QUESTION NOS. STAFF 1-1 THROUGH STAFF 1-11**

INSTRUCTIONS

- 1) Pursuant to 16 TAC § 22.144(c)(2), Staff 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) Staff 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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- Staff 1-1** Please provide a copy of Aqua WSC's distribution system map, including the water line size and the existing connections for each line.
- Staff 1-2** Provide the date the Texas Commission on Environmental Quality (TCEQ) or any of its processors approved the original public water system for the Aqua Water Supply Corporation (WSC).
- Staff 1-3** Provide the Aqua WSC bylaws and tariffs including the standard tap fee to obtain service.
- Staff 1-4** Provide any capital improvement plans for future growth and an expansion in service along Shadow Oak Dr.
- Staff 1-5** Provide any signed and sealed engineering studies prepared to obtain service in the area of Richard T. Lee's residence.
- Staff 1-6** Provide an explanation for the decision not to tap into the 4" line on Shadow Oak Dr. which has been used for neighboring residences to obtain service with supporting documentation such as a signed and sealed engineering study.
- Staff 1-7** Include supporting documentation with the cost breakdown of the construction costs totaling to \$13,500 for Richard T. Lee's request for service.
- Staff 1-8** Provide any and all bids for the construction of Richard T. Lee's request for service.
- Staff 1-9** Provide an explanation for the need to charge a contingency fee.
- Staff 1-10** Provide an explanation for the need to charge a capacity reservation fee for a single residence.
- Staff 1-11** Provide any funding applied for or secured for the above mentioned construction costs to tap into the 12" water line for Richard T. Lee's request for service.