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PUC DOCKET NO. 53266

APPLICATION OF AQUA TEXAS,	§	BEFORE THE PUBLIC UTILITY
INC. TO AMEND ITS CERTIFICATE	§	
OF CONVENIENCE AND NECESSITY	§	COMMISSION OF TEXAS
IN PARKER COUNTY	§	

**AQUA'S RESPONSE TO COMMISSION STAFF'S
FIRST REQUEST FOR INFORMATION**

To: Public Utility Commission of Texas Staff, by and through its attorney of record, Scott Miles, Public Utility Commission of Texas, 1701 N. Congress Avenue, Austin, Texas 78711-3326

Aqua Texas, Inc. (Aqua) serves the following Responses to Commission Staff's First Request for Information. Aqua stipulates that the following responses to RFIs may be treated by all parties as if the answer was filed under oath.

Respectfully submitted,

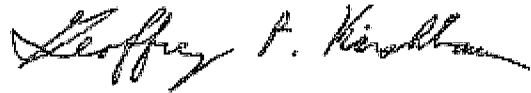
By: 

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ATTORNEYS FOR AQUA TEXAS, INC.

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 July 28, 2022, in accordance with the Orders Suspending Rules filed in Project No. 50664.

A handwritten signature in black ink, reading "Geoffrey P. Kirshbaum". The signature is written in a cursive style with a large, stylized 'G' and 'K'.

Geoffrey P. Kirshbaum

RESPONSES TO REQUESTS FOR INFORMATION

Staff RFI 1-1

Please refer to the Affidavit from Mr. Bagdasarian included as Attachment 3 to the application. Mr. Bagdasarian claims that the note, attached to the affidavit as Exhibit E, serves as a financial Guaranty from Essential, but the note does not indicate that Aqua's loan may increase to cover any temporary cash, operating, or maintenance shortages. Therefore, Mr. Bagdasarian's claim is not enough to satisfy 16 TAC § 24.11(e)(3) or (e)(2)(E). Please file a Guaranty from Essential, not Aqua, which proves that Essential is capable, available, and willing to cover Aqua's temporary cash shortages.

RESPONSE:

This request was withdrawn by agreement with counsel for Commission Staff.

RESPONSES TO REQUESTS FOR INFORMATION

Staff RFI 1-2 Please file Aqua's and Essential's most recent financial statements ending December 31, 2021.

RESPONSE: This request was withdrawn by agreement with counsel for Commission Staff.

RESPONSES TO REQUESTS FOR INFORMATION

Staff RFI 1-3 Please refer to Exhibit C of Attachment 3 in the application. Please detail whether the proforma five-year projections relate to just newly added systems or all of Aqua Texas.

RESPONSE: This request was withdrawn by agreement with counsel for Commission Staff.

RESPONSES TO REQUESTS FOR INFORMATION

Staff RFI 1-4 Please detail whether the same projections are in dollars or thousands of dollars.

RESPONSE: This request was withdrawn by agreement with counsel for Commission Staff.