

CUSTOMER SERVICE INSPECTION CERTIFICATION

Name of PWS—Concord Robbins WSC PWS I.D. 1450018 and Lakeside WSC PWS I.D. 1450021

Location of Service _____

Reason for Inspection: New construction☐
Existing service where contaminant hazards are suspected.....☐
Major renovation or expansion of distribution facilities☐

I Travis Treadway, upon inspection of the private water distribution facilities connected to the aforementioned public water supply do hereby certify that, to the best of my knowledge:

- | | Compliance | Non-Compliance |
|---|--------------------------|--------------------------|
| (1) No direct connection between the public drinking water supply and a potential source of contamination exists. Potential sources of contamination are isolated from the public water system by an air gap or an appropriate backflow prevention assembly in accordance with commission regulations. | <input type="checkbox"/> | <input type="checkbox"/> |
| (2) No cross-connection between the public drinking water supply and a private water system exists. Where an actual air gap is not maintained between the public water supply and a private water supply, an approved reduced pressure-zone backflow prevention assembly is properly installed and a service agreement exists for annual inspection and testing by a certified backflow prevention device tester. | <input type="checkbox"/> | <input type="checkbox"/> |
| (3) No connection exists which would allow the return of water used for condensing, cooling or industrial processes back to the public water supply. | <input type="checkbox"/> | <input type="checkbox"/> |
| (4) No pipe or pipe fitting which contains more than 8.0% lead exists in private water distribution facilities installed on or after July 1, 1988 and prior to January 4, 2014. | <input type="checkbox"/> | <input type="checkbox"/> |
| (5) Plumbing installed after January 4, 2014 bears the expected labeling indicating $\leq 0.25\%$ lead content. If not properly labeled, please provide written comment. | <input type="checkbox"/> | <input type="checkbox"/> |
| (6) No solder or flux which contains more than 0.2% lead exists in private water distribution facilities installed on or after July 1, 1988. | <input type="checkbox"/> | <input type="checkbox"/> |

Water service shall not be provided or restored to the private water distribution facilities until the above conditions are determined to be in compliance.

I further certify that the following materials were used in the installation of the water distribution facilities:

Service lines	Lead	<input type="checkbox"/>	Copper	<input type="checkbox"/>	PVC	<input type="checkbox"/>	Other	<input type="checkbox"/>
Solder	Lead	<input type="checkbox"/>	Lead Free	<input type="checkbox"/>	Solvent Weld	<input type="checkbox"/>	Other	<input type="checkbox"/>

I recognize that this document shall become a permanent record of the aforementioned Public Water System and that I am legally responsible for the validity of the information I have provided.

Remarks: _____

Signature of Inspector

CI0010007
Registration Number

Inspector
Title _____

CSI
Type of Registration

Date

SECTION K
MISCELLANEOUS FORMS

TARIFF FILING REQUIREMENTS

Date

Tariff Clerk
Office of Water Supply Division, MC 153
TCEQ
P.O. Box 13087
Austin, Texas 78711-3087

Re: Tariff for Concord Robbins WSC, CCN No. 11717 & 12137, in Leon County

Dear Tariff Clerk:

Pursuant to Texas Water Code Section 13.136(c) and 30 TAC Section 291.21(j), enclosed is a tariff for Concord Robbins Water Supply Corporation provided for informational purposes. *The tariff was revised and changed in October 2014; therefore, please discard the previously filed tariff and replace it with the attached.*

Should you or your staff have any questions, please contact me at (903) 626-4330.

Sincerely,

Travis Treadway
General Manager
Concord Robbins WSC

NOTICE OF RATE INCREASE

The Concord Robbins Water Supply Corporation ("Corporation") Board of Directors held a public meeting on _____ (date) and voted to increase the monthly rates for water service for all members. (Insert reason for rate increase including measures the Corporation took to justify the increase such as rate analysis, etc.)

The new rates will take effect 30 days after this board decision, on _____ (date) and the new monthly rates will begin starting with the _____ (month) billing. The rate changes are as follows:

METER SIZE	5/8" X 3/4" METER EQUIVALENTS	NEW MONTHLY BASE RATE	CURRENT MONTHLY BASE RATE
5/8" X 3/4"	1.0	\$_____.00	\$_____.00
3/4"	1.5	\$_____.00	\$_____.00
1"	2.5	\$_____.00	\$_____.00
1 1/2"	5.0	\$_____.00	\$_____.00
2"	8.0	\$_____.00	\$_____.00
3" DISP.	9.0	\$_____.00	\$_____.00
3" CMPD.	16.0	\$_____.00	\$_____.00
3" TURB.	17.5	\$_____.00	\$_____.00
4" CMPD.	25.0	\$_____.00	\$_____.00
4" TURB.	30.0	\$_____.00	\$_____.00
6" CMPD.	50.0	\$_____.00	\$_____.00
6" TURB.	62.5	\$_____.00	\$_____.00
8" CMPD.	80.0	\$_____.00	\$_____.00

Water Gallonage charge	NEW MONTHLY	CURRENT MONTHLY
\$ 0.00 per 1,000 gallons for 0 to 1,000 gallons	\$_____.00	\$_____.00
\$_.00 per 1,000 gallons for 1,001 gallons to 2,000 gallons	\$_____.00	\$_____.00
\$_.00 per 1,000 gallons for 2,001 gallons to 5,000 gallons	\$_____.00	\$_____.00
\$_.00 per 1,000 gallons for 5,001 gallons to 10,000 gallons	\$_____.00	\$_____.00
\$_.00 per 1,000 gallons for 10,001 gallons to 15,000 gallons	\$_____.00	\$_____.00
\$_.00 per 1,000 gallons for 15,001 gallons to 20,000 gallons	\$_____.00	\$_____.00
\$_.00 per 1,000 gallons for 20,001 gallons and over	\$_____.00	\$_____.00

For more information about the rate increase, please contact the Corporation at 903-626-4330 or in person at our main office – 9066 State Hwy 7 West, Jewett, TX 75846

CALCULATION OF THE AVERAGE NET EQUITY BUY IN FEE OF A SAMPLE UTILITY

Meaningful determination of the Average Net Equity Buy In Fee is achieved only when the following conditions are met in calculation of the fee:

1. An accurate accounting of the fixed and cash assets of the utility should be maintained, preferably by a Certified Public Accountant; and
2. All funds obtained as an Equity Buy In Fee or other similar funds which are to be used for future capital expenditures should be maintained in a separate fund and ear-marked for this purpose. This amount should not include the Membership Reserve or debt reserves;
3. A realistic depreciation schedule should be maintained for each asset item based on its anticipated useful life rather than on the life of the debt incurred to pay for the asset; and
4. An actual count should be retained of existing and terminated accounts for which capital contributions have been received, but not to include Membership transfers. This count shall be the number of Contributing Members on which the average is taken in calculation of the Net Equity Buy In Fee.

EXAMPLE:

Fixed Assets Of The Corporation	\$3,000,000.00
Minus (-) Accumulated Depreciation	\$750,000.00
Minus (-) Outstanding Corporation Debt Principle	\$800,000.00
Equals (=) Corporation Equity.....	\$1, 450,000.00
Minus (-) Developer's Capital Contribution.....	\$57,000.00
Minus (-) Grants Received.....	\$500,000.00
Total Number of Members / Customers Equals (=) Net Equity Buy In fee	\$893,000.00
Average Net Equity Per 2,000 Contributing Members.....	\$446.50

**TRWA RECOMMENDED 5/8" X 3/4" METER EQUIVALENTS BASED
ON AWWA SPECIFICATIONS AND DESIGN CRITERIA**

METER SIZE	RECOMMENDED CONTINUOUS RESIDENTIAL METER RATE OF FLOW	EQUIVALENTS
5/8" X 3/4"	10.0 GPM	1.00
3/4"	15.0 GPM	1.50
1"	25.0 GPM	2.50
1 1/2"	50.0 GPM	5.00
2"	80.0 GPM	8.00
3" DISP.	90.0 GPM	9.00
3" CMPD	160.0 GPM	16.00
3" TURB.	175.0 GPM	17.50
4" CMPD	250.0 GPM	25.00
4" TURB.	300.0 GPM	30.00
6" CMPD	500.0 GPM	50.00
6" TURB.	625.0 GPM	62.50
8" CMPD	800.0 GPM	80.00
10" CMPD	1,150.0 GPM	115.00

NOTE: ALTHOUGH AWWA DOES NOT RECOMMEND A CONTINUOUS FLOW OF GREATER THAN 50 PERCENT FOR DISPLACEMENT AND MULTIJET METERS, METER EQUIVALENTS ARE CALCULATED ON A PROPORTIONAL BASIS AND REMAIN THE SAME REGARDLESS OF ALLOWABLE RATES.

VOLUNTARY CONTRIBUTIONS ON BEHALF OF EMERGENCY SERVICES

CONCORD ROBBINS WSC POLICY ON VOLUNTARY CONTRIBUTIONS ON BEHALF OF EMERGENCY SERVICES

The corporation shall as part of its billing process collect from its customers a voluntary contribution, including a voluntary membership or subscription fee, on behalf of a volunteer fire department or an emergency medical service.

The corporation shall provide each customer at the time that the customer first subscribes to the water service, and at least annually thereafter, a written statement:

- 1) describing the procedure by which the customer may make a contribution with the customer's bill payment;
- 2) designating the volunteer fire department(s) or emergency medical service(s) to which the corporation will deliver the contribution;
- 3) informing the customer that a contribution is voluntary; and
- 4) describing the deductibility status of the contribution under federal income tax law.

All billing by the corporation shall clearly state that the contribution is voluntary and that it may be deducted from the billed amount.

The corporation shall promptly deliver contributions that it collects under this section to the designated volunteer fire department(s) or emergency medical service(s), except that the corporation may keep from the contributions an amount equal to the lesser of:

- 1) the corporation's expenses in administering the contribution program; or
- 2) five percent of the amount collected as contributions.

SAMPLE NOTICE TO THE CUSTOMERS

The Concord Robbins WSC is offering each customer the opportunity to make a voluntary contribution to the local voluntary fire department(s) and / or emergency medical service(s). The \$XX.00 contribution amount should be added to each remittance of the monthly base rate.

These voluntary contributions will be sent to the following Voluntary Fire Department(s) and or Emergency Service(s): **(LIST ALL applicable recipients). Ever Alert Voluntary Fire Department, South Side Voluntary Fire Department, Ever Alert Emergency Rescue Service,**

This voluntary contribution may be deductible under the Federal Income Tax Law.

For a complete copy of the Corporation's Voluntary Contribution Policy, please make request at the Corporation's office at 9066 State Hwy 7 Jewett, TX, by phone 903-626-4330, Corporation's Web Page-- www.concordrobbins.com, or by FAX 903-626-4377.

SAMPLE LANGUAGE FOR BILLING CARD

Each customer has the right to deduct the \$X.00 contribution from the final amount stated on this water bill.

OR— Each customer has the right to contribute any extra contribution as a voluntary contribution for local emergency services.

REFERENCE FROM TEXAS WATER CODE CHAPTER 67.

Sec. 67.017. VOLUNTARY CONTRIBUTIONS ON BEHALF OF EMERGENCY SERVICES.

(a) A corporation may as part of its billing process collect from its customers a voluntary contribution, including a voluntary membership or subscription fee, on behalf of a volunteer fire department or an emergency medical service.

(b) A corporation that collects contributions under this section shall provide each customer at the time that the customer first subscribes to the water or sewer service, and at least annually thereafter, a written statement:

- (1) describing the procedure by which the customer may make a contribution with the customer's bill payment;
- (2) designating the volunteer fire department or emergency medical service to which the corporation will deliver the contribution;
- (3) informing the customer that a contribution is voluntary; and
- (4) describing the deductibility status of the contribution under federal income tax law.

(c) A billing by the corporation that includes a voluntary contribution under this section must clearly state that the contribution is voluntary and that it may be deducted from the billed amount.

(d) The corporation shall promptly deliver contributions that it collects under this section to the designated volunteer fire department or emergency medical service, except that the corporation may keep from the contributions an amount equal to the lesser of:

- (1) the corporation's expenses in administering the contribution program; or
- (2) five percent of the amount collected as contributions.

Added by Acts 1997, 75th Leg., ch. 166, Sec. 2, eff. Sept. 1, 1997.

CONCORD-ROBBINS WATER SUPPLY CORPORATION

Independent Auditors' Report

and

Financial Statements

As of and for the Years Ended

December 31, 2020 and 2019

CONCORD-ROBBINS WATER SUPPLY CORPORATION

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December 31, 2020 and 2019

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Milberger Nesbitt & Ask, L.L.P.
(a Registered Limited Liability Partnership consisting of a Professional Corporation and an Individual)

Certified Public Accountants

Milberger & Nesbitt, P.C.
William V. Milberger, CPA
Clay W. Nesbitt, CPA

Russell C. Armagost, CPA
Xi (Sophie) Li, CPA

Independent Auditors' Report

Board of Directors
Concord-Robbins Water Supply Corporation
Marquez, Texas

Report on the Financial Statements

We have audited the accompanying financial statements of Concord-Robbins Water Supply Corporation (a nonprofit organization), which comprise the statement of financial position as of December 31, 2020 and 2019, and the related statements of activities and cash flows for the year then ended, and the related notes to the financial statements.

Management's Responsibility for the Financial Statements

Management is responsible for the preparation and fair presentation of these financial statements in accordance with accounting principles generally accepted in the United States of America; this includes the design, implementation, and maintenance of internal control relevant to the preparation and fair presentation of financial statements that are free from material misstatement, whether due to fraud or error.

Auditor's Responsibility

Our responsibility is to express an opinion on these financial statements based on our audit. We conducted our audit in accordance with auditing standards generally accepted in the United States of America and the standards applicable to financial audits contained in *Government Auditing Standards*, issued by the Comptroller General of the United States. Those standards require that we plan and perform the audit to obtain reasonable assurance about whether the financial statements are free from material misstatement.

An audit involves performing procedures to obtain audit evidence about the amounts and disclosures in the financial statements. The procedures selected depend on the auditor's judgment, including the assessment of the risks of material misstatement of the financial statements, whether due to fraud or error. In making those risk assessments, the auditor considers internal control relevant to the entity's preparation and fair presentation of the financial statements in order to design audit procedures that are appropriate in the circumstances, but not for the purpose of expressing an opinion on the effectiveness of the entity's internal control. Accordingly, we express no such opinion. An audit also includes evaluating the appropriateness of accounting policies used and the reasonableness of significant accounting estimates made by management, as well as evaluating the overall presentation of the financial statements.


We believe that the audit evidence we have obtained is sufficient and appropriate to provide a basis for our audit opinion.

Opinion

In our opinion, the financial statements referred to above present fairly, in all material respects, the financial position of Concord-Robbins Water Supply Corporation as of December 31, 2020 and 2019, and the changes in its net assets and its cash flows for the year then ended in accordance with accounting principles generally accepted in the United States of America.

Other Reporting Required by *Government Auditing Standards*

In accordance with *Government Auditing Standards*, we have also issued our report dated April 7, 2021, on our consideration of Concord-Robbins Water Supply Corporation's internal control over financial reporting and on our tests of its compliance with certain provisions of laws, regulations, contracts, and grant agreements and other matters. The purpose of that report is to describe the scope of our testing of internal control over financial reporting and compliance and the results of that testing, and not to provide an opinion on internal control over financial reporting or on compliance. That report is an integral part of an audit performed in accordance with *Government Auditing Standards* in considering Concord-Robbins Water Supply Corporation's internal control over financial reporting and compliance.

A handwritten signature in black ink that reads "Milberger Nesbitt & Ask, LLP". The signature is written in a cursive, flowing style.

Bryan, Texas
April 7, 2021

MILBERGER NESBITT & ASK, L.L.P.
Certified Public Accountants

CONCORD-ROBBINS WATER SUPPLY CORPORATION
Statements of Financial Position

	December 31,	
	2020	2019
	<u>Assets</u>	
Current Assets		
Cash	\$ 491,977	\$ 268,290
Certificates of deposit	214,290	312,363
Accounts receivable, net of allowance for uncollectible	61,900	59,637
Prepaid expense	2,309	2,386
Total Current Assets	<u>\$ 770,476</u>	<u>\$ 642,676</u>
Restricted Assets		
Reserve Funds	163,000	163,000
Capital Assets, net	6,127,587	5,877,316
Other Assets		
Loan security deposit	1,633	1,000
	<u>\$ 1,633</u>	<u>\$ 1,000</u>
Total Assets	<u>\$ 7,062,696</u>	<u>\$ 6,683,992</u>
	<u>Liabilities</u>	
Current Liabilities		
Accounts payable and accrued expenses	\$ 12,516	\$ 4,021
Intent deposits	5,000	5,000
Notes payable - current portion	140,476	105,650
Total Current Liabilities	<u>\$ 157,992</u>	<u>\$ 114,671</u>
Membership Deposits	160,100	156,600
Notes payable - less current portion	3,951,820	3,687,993
Total Liabilities	<u>\$ 4,269,912</u>	<u>\$ 3,959,264</u>
	<u>Net Assets</u>	
Net Assets Without Donor Restrictions		
Invested in capital assets, net of related debt	\$ 2,035,291	\$ 2,083,673
Restricted net assets for reserves	163,000	163,000
Restricted net assets for membership deposits	160,100	156,600
Unrestricted	434,393	321,455
Total Net Assets	<u>\$ 2,792,784</u>	<u>\$ 2,724,728</u>
Total Liabilities and Net Assets	<u>\$ 7,062,696</u>	<u>\$ 6,683,992</u>

The accompanying notes are an integral part of the financial statements.

CONCORD-ROBBINS WATER SUPPLY CORPORATION
Statements of Activities

	For the Year Ended December 31,	
	2020	2019
Operating Revenue		
Metered water sales	\$ 871,736	\$ 854,524
Tap and installation fees	42,763	48,490
Penalty and late fees	11,545	425
Total operating revenue	<u>\$ 926,044</u>	<u>\$ 903,439</u>
Operating expenses		
Chemicals and supplies	\$ 45,233	\$ 48,066
Depreciation expense	255,361	218,629
Dues, fees and subscriptions	13,278	14,915
Insurance	51,585	56,109
Service vehicles expense	19,732	26,030
Office and postage expense	31,890	26,551
Professional fees	14,636	6,195
System repairs and maintenance	25,701	32,721
Wages and salaries	224,882	250,904
Employee benefits, including payroll taxes	25,377	24,042
Power purchased for pumping	46,683	50,126
Training and education	750	945
Miscellaneous expense	5,919	10,301
Total operating expenses	<u>\$ 761,027</u>	<u>\$ 765,534</u>
Change in net assets from operations	<u>\$ 165,017</u>	<u>\$ 137,905</u>
Other income (expense)		
Interest income	\$ 9,272	\$ 7,982
Miscellaneous income	1,397	150
Gain (loss) on disposition of fixed assets	4,638	-
Loss on contractor settlement	(45,968)	-
Developer contracts	66,200	45,000
Interest expense	(132,500)	(128,821)
Total other income (expense)	<u>\$ (96,961)</u>	<u>\$ (75,689)</u>
Change in net assets	\$ 68,056	\$ 62,216
Net assets, beginning of the year	<u>2,724,728</u>	<u>2,662,512</u>
Net assets, ending of the year	<u><u>\$ 2,792,784</u></u>	<u><u>\$ 2,724,728</u></u>

The accompanying notes are an integral part of the financial statements.

CONCORD-ROBBINS WATER SUPPLY CORPORATION
Statements of Cash Flows

	For the Year Ended December 31,	
	2020	2019
Cash Flows From Operating Activities		
Change in net assets	\$ 68,056	\$ 62,216
Noncash income and expenses included in change in net assets:		
Depreciation	255,361	218,629
(Gain) loss on disposition/settlement of fixed assets	41,330	-
Proceeds from developer contracts	-	(45,000)
(Increase) decrease in accounts receivable, net	(2,263)	3,041
Decrease in prepaid expense	77	1,877
Increase in loan security deposit	(633)	(1,000)
Increase (decrease) in accounts payable and accrued liabilities	8,495	(114,397)
Decrease in intent deposits	-	(1,600)
Cash provided by operating activities	<u>\$ 370,423</u>	<u>\$ 123,766</u>
Cash Flows From Investing Activities		
Purchases of capital assets	\$ (633,462)	\$(1,853,544)
Proceeds from sale/settlement of fixed assets	86,500	-
Construction in progress	-	1,479,404
Decrease (increase) in certificates of deposit	<u>98,073</u>	<u>(2,225)</u>
Cash used by investing activities	<u>\$ (448,889)</u>	<u>\$ (376,365)</u>
Cash Flows From Financing Activities		
Principal payments on notes payable	\$ (126,347)	\$(2,119,447)
Notes payable advances	425,000	2,466,990
Change in membership deposits	<u>3,500</u>	<u>2,200</u>
Cash provided by financing activities	<u>\$ 302,153</u>	<u>\$ 349,743</u>
Net increase in cash	\$ 223,687	\$ 97,144
Cash, beginning of year	<u>268,290</u>	<u>171,146</u>
Cash, end of year	<u>\$ 491,977</u>	<u>\$ 268,290</u>

The accompanying notes are an integral part of the financial statements.

CONCORD-ROBBINS WATER SUPPLY CORPORATION

Notes to the Financial Statements

December 31, 2020 and 2019

Note A - Summary of Significant Accounting Policies

Organization

Concord-Robbins Water Supply Corporation (the Corporation) is a non-profit corporation organized under Article 1434A of the Revised Civil Statutes of Texas of 1925, as amended by the Texas Non-Profit Corporation Act, Article 1.01 et seq., as amended. The Corporation was incorporated in the State of Texas on November 13, 1979.

The Corporation was established to furnish a water supply for general farm use and domestic purposes to individuals residing in certain rural communities of Leon County, Texas.

The accounting policies of Concord-Robbins Water Supply Corporation conform to generally accepted accounting principles. The following is a summary of the more significant policies:

Financial Statement Presentation

The accompanying financial statements have been prepared using the accrual basis of accounting.

The accompanying financial statements are presented in accordance with the Financial Accounting Standards Board (FASB) Accounting Standards Codification, which is the source for authoritative accounting principles for nongovernmental entities. All standards applicable to the Corporation have been properly adopted and applied in the preparation of the financial statements.

Under the provisions of the Guide net assets and revenues, and gains and losses are classified based on the existence or absence of donor-imposed restrictions. Accordingly, the net assets of the Corporation and changes therein are classified as follows:

Net assets without donor restrictions – Net assets that are not subject to donor-imposed restrictions and may be expended for any purpose in performing the primary objectives of the Corporation. The Corporation's Board may designate assets with restrictions for specific operational purposes from time to time.

The Corporation classifies its net assets without donor restrictions into three components – invested in capital assets, net of related debt; restricted; and unrestricted. These classifications are defined as follows:

Invested in capital assets – this component consists of capital assets, including restricted capital assets, net of accumulated depreciation.

Restricted – this component consists of external constraints imposed on net assets by creditors, grantors, or laws or regulations of other governments or through constitutional provisions or enabling legislation.

Unrestricted – this component consists of net assets that do not meet the definition of “restricted” or “invested in capital assets, net of related debt.”

Net assets with donor restrictions – Net assets subject to stipulations imposed by donors, and grantors. Some donor restrictions are temporary in nature; those restrictions will be met by actions of the Corporation or by the passage of time. Other donor restrictions are perpetual in nature, where by the donor has stipulated the funds be maintained in perpetuity. The Corporation had no net assets with donor restrictions at December 31, 2020 and 2019.

CONCORD-ROBBINS WATER SUPPLY CORPORATION

Notes to the Financial Statements - continued

December 31, 2020 and 2019

Note A - Summary of Significant Accounting Policies – continued

Revenue Recognition

In accordance with FASB Accounting Standards Codification, (“ASC”) Topic 606, *Revenue from Contracts with Customers* (“ASC 606”), the Corporation recognizes revenue when control of the promised goods or services are transferred to the Organization’s members or outside parties in an amount that reflects the consideration the Corporation expects to be entitled to in exchange for those goods or services.

The Organization’s revenue primarily relates to contract services to members. Revenue recognition for these revenue streams is at the point in time coinciding with the completion of the corresponding obligations to its members.

Cash and Cash Equivalents

For purposes of the statement of cash flows, the Corporation considers all cash and highly liquid investments with initial maturities of three months or less to be cash equivalents. Certificates of deposit with original maturities of less than 90 days are classified as cash equivalents.

Fair Value of Financial Instruments

The carrying amounts of cash equivalents and current liabilities approximate fair value because of the short maturity of those investments.

Concentration of Credit Risk

Custodial credit risk is the risk, that, in the event of a bank failure, the Corporation’s deposits may not be returned to it. The Corporation maintains its cash and cash equivalent balances in five financial institutions, which at times, may exceed federally insured limits. The Corporation has not experienced any losses on such accounts.

Contributed Services

Many individuals volunteer their time and perform a variety of tasks that assist the Corporation, but these services do not meet the criteria for recognition as contributed services.

Geographic Concentration

The Corporation conducts its operations solely in western Leon County, and, therefore, is subject to risks from changes in local weather conditions.

Capital Assets

Capital assets are stated at cost, if purchased, or at fair value at the date of the gift, if donated, less accumulated depreciation. Depreciation is computed on the straight-line basis over estimated useful lives of; buildings (15-40 years), distribution systems and improvements (5-50 years), and machinery and equipment (5-15 years). At the time capital assets are retired or otherwise disposed of, the cost and related accumulated depreciation are adjusted, and any gain or loss on disposal is included in the statement of activities. Additionally, the Corporation periodically reviews the carrying value of capital assets and will recognize impairments when the expected future cash flow derived from such assets is less than their carrying value.

CONCORD-ROBBINS WATER SUPPLY CORPORATION

Notes to the Financial Statements - continued

December 31, 2020 and 2019

Note A - Summary of Significant Accounting Policies – continued

Accounts Receivable

Accounts receivable consist of charges to members for monthly water service. The Corporation has pledged these receivables to the USDA – Rural Development as collateral on all outstanding notes. Accounts receivable are recorded in the accompanying statement of financial position net of an allowance for uncollectible accounts of \$4,924 and \$4,838 as of December 31, 2020 and 2019, respectively.

Estimates

The preparation of financial statements in conformity with accounting principles generally accepted in the United States of America requires management to make estimates and assumptions that affect the reported amounts of assets and liabilities and disclosure of contingent assets and liabilities at the date of the financial statements and the reported amounts of revenues and expenses during the reporting period. Actual results could differ from those estimates.

Note B – Reserve for Emergency Repairs and Debt Retirement

The Corporation is required, as long as it is indebted to the USDA – Rural Development (formerly FmHA) to deposit from its revenues, one tenth of its total mortgage payments (including interest) in a reserve account, separate and apart from other accounts, in an insured Texas Bank or in U.S. Government-backed securities. Such deposits continue until the account balance equals one year's mortgage payments (including interest). Disbursements may be used for payments due on the notes if sufficient funds are not available. With the prior written approval from the Government, funds may be withdrawn for: (1) paying the cost of repairing or replacing any damage to the Facility which may have been caused by catastrophe or (2) making extensions or improvements to the Facility.

At December 31, 2020 and 2019, the portion of the invested funds – reserve account, set aside for emergency repairs and debt retirement, equaled \$163,000, which is \$68,803 over the required reserve amount of \$94,197.

Note C – Member Investment

Membership in the Corporation is currently sold for \$100 and one membership must be purchased to use the system facilities. The membership cost is refundable to a current member wishing to no longer access the system facilities.

At December 31, 2020 and 2019, there were 1,601 and 1,566 memberships, respectively. The portion of invested funds – reserve account, set aside for refundable membership, is \$160,100 and \$156,600 at December 31, 2020 and 2019, respectively.

CONCORD-ROBBINS WATER SUPPLY CORPORATION

Notes to the Financial Statements - continued

December 31, 2020 and 2019

Note D - Capital Assets

Capital asset activity for the years ended December 31, 2020 and 2019, was as follows:

	Capital Assets, Not Depreciated		Capital Assets, Depreciated		
	Land	Buildings and Improvements	Distribution System and Improvements	Machinery and Equipment	Total
Balances, beginning	\$ 9,295	\$ 157,215	\$ 8,884,616	\$ 315,999	\$ 9,367,125
Increases	16,000	-	591,588	25,874	633,462
Decreases	-	-	(129,475)	(48,094)	(177,569)
Balances, ending	<u>\$ 25,295</u>	<u>\$ 157,215</u>	<u>\$ 9,346,729</u>	<u>\$ 293,779</u>	<u>\$ 9,823,018</u>
Accumulated Depreciation					
Balances, beginning	\$ -	\$ 59,257	\$ 3,175,046	\$ 255,506	\$ 3,489,809
Increases	-	4,486	229,515	21,360	255,361
Decreases	-	-	(3,507)	(46,232)	(49,739)
Balances, ending	<u>\$ -</u>	<u>\$ 63,743</u>	<u>\$ 3,401,054</u>	<u>\$ 230,634</u>	<u>\$ 3,695,431</u>
Capital Assets, net	<u>\$ 25,295</u>	<u>\$ 93,472</u>	<u>\$ 5,945,675</u>	<u>\$ 63,145</u>	<u>\$ 6,127,587</u>

CONCORD-ROBBINS WATER SUPPLY CORPORATION

Notes to the Financial Statements - continued

December 31, 2020 and 2019

Note E - Notes Payable

A summary of notes payable at December 31, 2020 and 2019 is as follows:

	<u>Interest Rate</u>	<u>Maturity Date</u>	<u>Montly Payment</u>	<u>Balance 12/31/20</u>	<u>Balance 12/31/19</u>
<u>USDA</u>					
91-11	2.75%	May 13, 2058	\$ 6,399	\$ 1,763,543	\$ 1,791,418
<u>CoBank</u>					
T01	2.90%	April 21, 2032	3,511	\$ 405,131	\$ -
T02	3.65%	June 20, 2035	5,896 - 5,901	792,008	832,470
T03	3.90%	April 20, 2040	6992 - 7,001	<u>1,131,614</u>	<u>1,169,755</u>
				<u>\$ 2,328,753</u>	<u>\$ 2,002,225</u>
				<u>\$ 4,092,296</u>	<u>\$ 3,793,643</u>

The Corporation is indebted to the USDA – Rural Development which was used to fund a major water system infrastructure and improvements. Deeds of trust on water system assets and security interests in revenues are used as collateral.

Note payable activity for the years ended December 31, 2020 and 2019, is as follows:

	<u>Balances 12/31/2019</u>	<u>Principal Advances (Payments)</u>	<u>Balances 12/31/2020</u>	<u>Current Portion</u>	<u>Long-term Portion</u>
<u>USDA</u>					
91-11	1,791,418	(27,874)	1,763,543	27,974	1,735,569
<u>Co-Bank</u>					
T01	-	405,131	405,131	30,624	374,507
T02	832,470	(40,462)	792,008	42,071	749,937
T03	<u>1,169,755</u>	<u>(38,141)</u>	<u>1,131,614</u>	<u>39,807</u>	<u>1,091,807</u>
	<u>\$ 3,793,643</u>	<u>\$ 298,654</u>	<u>\$ 4,092,296</u>	<u>\$140,476</u>	<u>\$3,951,820</u>

CONCORD-ROBBINS WATER SUPPLY CORPORATION

Notes to the Financial Statements - continued

December 31, 2020 and 2019

Note E - Notes Payable - continued

Maturities of long-term debt as of December 31, 2020 are as follows:

Year ended December 31,	
2021	\$ 140,476
2022	145,365
2023	150,427
2024	155,335
2025	161,088
Thereafter	<u>3,339,605</u>
	<u>\$ 4,092,296</u>

Note F – Water Usage

Water withdrawn for the years ended December 31, 2020 and 2019 is as follows:

	<u>2020</u>	<u>2019</u>
Gallons pumped from wells	113,581,000	104,475,000
Gallons flushed from water lines	2,194,000	4,106,711
Gallons lost due to leaks	997,431	1,076,200
Gallons sold to members	100,911,400	90,076,940
Percentage of unaccountable water	8.34%	8.82%

Note G – Commitments and Contingencies

The Corporation must comply with covenants contained in the original closing instructions with the respective related instruments, all documents executed with the USDA – Rural Development and Co-Bank, applicable regulations of the Texas Commission on Environmental Quality, applicable regulations of the Texas Department of Health, and applicable regulations of other state, local and federal agencies with the authority to regulate water supply and water districts. The Corporation believes it is in substantial compliance with all applicable laws and regulations.

Note H - Retirement Plan

The Corporation offers its employees a “Simple IRA” retirement plan, covering substantially all eligible employees. The Corporation elected to contribute an amount equal up to 3% matching of each eligible employee’s compensation. For the years ended December 31, 2020 and 2019, the Corporation contributed \$4,188 and \$4,820, respectively to the employees’ retirement accounts.

CONCORD-ROBBINS WATER SUPPLY CORPORATION

Notes to the Financial Statements - continued

December 31, 2020 and 2019

Note I – Tax Status

The Corporation is classified as a not-for-profit organization under Section 501(c)(12) of the Internal Revenue Code and is exempt from federal income tax. However, the Corporation may be subject to income tax on unrelated business income. For the years ended December 31, 2020 and 2019, the Corporation had no unrelated business income.

The Corporation believes that it has appropriate support for all tax positions taken, and, as such does not have any uncertain tax positions that are material to the financial statements. The Corporation's information and tax returns for the years after 2016 are subject to examination by the Internal Revenue Service, generally for three years after they were filed.

Note J – Liquidity and Availability of Financial Assets

The Organization has \$770,476 of financial assets available within one year of the date of the statement of financial position to meet cash needs for general operating.

Note K – Subsequent Events

These financial statements considered subsequent events through April 7, 2021, the date the financial statements were available to be issued.

COVID-19

On March 11, 2020, the World Health Organization declared the outbreak of the Coronavirus (Covid-19) a global pandemic. The COVID-19 outbreak in the United States resulted in significant disruption to business operations and a significant increase in economic uncertainty. Prior to September 30, 2020, the Corporation's operations were affected in the following areas:

- Due to Shelter in Place orders, member visits to the office were severely decreased
- Administrative offices remained opened but the staff followed recommended sanitation and masking rules for staff and members

Subsequent to December 31, 2020, the Corporation has continued to be impacted by the COVID-19 virus. The office is operating and will continue to follow the recommendations of the Centers for Disease Control as well as those policies implemented by local and state officials. The Corporation is dedicated to continue operations in the best and safest way possible without jeopardizing the health of staff and those that receive services.

ADDITIONAL REQUIRED REPORTS

INDEPENDENT AUDITORS' REPORT ON INTERNAL CONTROL OVER FINANCIAL
REPORTING AND ON COMPLIANCE AND OTHER MATTERS BASED ON AN AUDIT OF FINANCIAL
STATEMENTS PERFORMED IN ACCORDANCE WITH *GOVERNMENT AUDITING STANDARDS*

Board of Directors
Concord-Robbins Water Supply Corporation
Marquez, Texas

We have audited, in accordance with the auditing standards generally accepted in the United States of America and the standards applicable to financial audits contained in *Government Auditing Standards* issued by the Comptroller General of the United States, the financial statements of Concord-Robbins Water Supply Corporation which comprise the statement of financial position as of December 31, 2020, and the related statements of activities and cash flows for the year then ended, and the related notes to the financial statements, and have issued our report thereon dated April 7, 2021.

Internal Control Over Financial Reporting

In planning and performing our audit of the financial statements, we considered Concord-Robbins Water Supply Corporation's internal control over financial reporting (internal control) to determine the audit procedures that are appropriate in the circumstances for the purpose of expressing our opinion on the financial statements, but not for the purpose of expressing an opinion on the effectiveness of Concord-Robbins Water Supply Corporation's internal control. Accordingly, we do not express an opinion on the effectiveness of Concord-Robbins Water Supply Corporation's internal control.

A deficiency in internal control exists when the design or operation of a control does not allow management or employees, in the normal course of performing their assigned functions, to prevent, or detect and correct, misstatements on a timely basis. *A material weakness* is a deficiency, or combination of deficiencies, in internal control, such that there is a reasonable possibility that a material misstatement of the entity's financial statements will not be prevented, or detected and corrected on a timely basis. *A significant deficiency* is a deficiency, or a combination of deficiencies, in internal control that is less severe than a material weakness, yet important enough to merit attention by those charged with governance.

Our consideration of internal control was for the limited purpose described in the first paragraph of this section and was not designed to identify all deficiencies in internal control that might be material weaknesses or, significant deficiencies. Given these limitations, during our audit we did not identify any deficiencies in internal control that we consider to be material weaknesses. However, material weaknesses may exist that have not been identified.

Compliance and Other Matters

As part of obtaining reasonable assurance about whether Concord-Robbins Water Supply Corporation's financial statements are free of material misstatement, we performed tests of its compliance with certain provisions of laws, regulations, contracts and grant agreements, noncompliance with which would have a direct and material effect on the determination of financial statement amounts. However, providing an opinion on compliance with those provisions was not an objective of our audit and, accordingly, we do not express such an opinion. The results of our tests disclosed no instances of noncompliance or other matters that are required to be reported under *Government Auditing Standards*.

Purpose of this Report

The purpose of this report is solely to describe the scope of our testing of internal control and compliance and the results of that testing, and not to provide an opinion on the effectiveness of the entity's internal control or on compliance. This report is an integral part of an audit performed in accordance with *Government Auditing Standards* in considering the entity's internal control and compliance. Accordingly, this communication is not suitable for any other purpose.

A handwritten signature in black ink that reads "Milberger Nesbitt & Ask, LLP". The signature is written in a cursive, flowing style.

Bryan, Texas
April 7, 2021

MILBERGER NESBITT & ASK, L.L.P.
Certified Public Accountants



Office of the Secretary of State
Packing Slip

December 12, 2016

Page 1 of 1

Attn: Rayburn Moore
JF FONTAINE & ASSOCIATES INC.
P O Box 4187
Palestine, TX 75802

Batch Number: 70392599

Batch Date: 12-12-2016

Client ID: 400383604

Return Method: Mail

Document Number	Document Detail	Number / Name	Page Count	Fee
703925990002	Expedited	CONCORD-ROBBINS WATER SUPPLY CORPORATION	0	\$25.00
703925990002	Restated Certificate of Formation	CONCORD-ROBBINS WATER SUPPLY CORPORATION	0	\$50.00
			Total Fees:	\$75.00

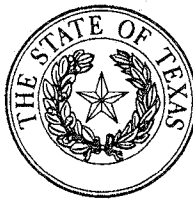
Payment Type	Payment Status	Payment Reference	Amount
Check	Received	6840	\$75.00
			Total: \$75.00

Total Amount Charged to Client Account: \$0.00

(Applies to documents or orders where Client Account is the payment method)

Note to Customers Paying by Client Account: This is not a bill. Payments to your client account should be based on the monthly statement and not this packing slip. Amounts credited to your client account may be refunded upon request. Refunds (if applicable) will be processed within 10 business days.

User ID: LSARTIN



Office of the Secretary of State

December 12, 2016

Attn: Rayburn Moore

JF FONTAINE & ASSOCIATES INC.
P O Box 4187
Palestine, TX 75802 USA

RE: CONCORD-ROBBINS WATER SUPPLY CORPORATION
File Number: 49830901

It has been our pleasure to file the Restated Certificate of Formation for the referenced entity. Enclosed is the certificate evidencing filing. Payment of the filing fee is acknowledged by this letter.

If we may be of further service at any time, please let us know.

Sincerely,

Corporations Section
Business & Public Filings Division
(512) 463-5555

Enclosure



Office of the Secretary of State

CERTIFICATE OF FILING OF

CONCORD-ROBBINS WATER SUPPLY CORPORATION
49830901

The undersigned, as Secretary of State of Texas, hereby certifies that a Restated Certificate of Formation for the above named domestic nonprofit corporation has been received in this office and has been found to conform to the applicable provisions of law.

ACCORDINGLY, the undersigned, as Secretary of State, and by virtue of the authority vested in the secretary by law, hereby issues this certificate evidencing filing effective on the date shown below.

Dated: 12/12/2016

Effective: 12/12/2016



A handwritten signature in black ink, appearing to read "Cascos", followed by a horizontal line.

Carlos H. Cascos
Secretary of State

Form 414
(Revised 09/13)

Submit in duplicate to:
Secretary of State
P.O. Box 13697
Austin, TX 78711-3697
512 463-5555
FAX: 512/463-5709
Filing Fee: See instructions



**Restated Certificate of
Formation
With New Amendments**

This space reserved for office use.

FILED
In the Office of the
Secretary of State of Texas
DEC 12 2016
Corporations Section

Entity Information

The name of the filing entity is:

Concord Robbins Water Supply Corporation

State the name of the entity as currently shown in the records of the secretary of state. If the amendment changes the name of the entity, state the old name and not the new name.

The filing entity is a: (Select the appropriate entity type below.)

- | | |
|---|---|
| <input type="checkbox"/> For-profit Corporation | <input type="checkbox"/> Professional Corporation |
| <input checked="" type="checkbox"/> Nonprofit Corporation | <input type="checkbox"/> Professional Limited Liability Company |
| <input type="checkbox"/> Cooperative Association | <input type="checkbox"/> Professional Association |
| <input type="checkbox"/> Limited Liability Company | <input type="checkbox"/> Limited Partnership |

The file number issued to the filing entity by the secretary of state is: 00498309-01

The date of formation of the filing entity is: February 4, 1997

Statement of Approval

Each new amendment has been made in accordance with the provisions of the Texas Business Organizations Code. The amendments to the certificate of formation and the restated certificate of formation have been approved in the manner required by the Code and by the governing documents of the entity.

Required Statements

The restated certificate of formation, which is attached to this form, accurately states the text of the certificate of formation being restated and each amendment to the certificate of formation being restated that is in effect, and as further amended by the restated certificate of formation. The attached restated certificate of formation does not contain any other change in the certificate of formation being restated except for the information permitted to be omitted by the provisions of the Texas Business Organizations Code applicable to the filing entity.

Effectiveness of Filing (Select either A, B, or C.)

- A. ☒ This document becomes effective when the document is filed by the secretary of state.
- B. ☐ This document becomes effective at a later date, which is not more than ninety (90) days from the date of signing. The delayed effective date is: _____
- C. ☐ This document takes effect upon the occurrence of the future event or fact, other than the passage of time. The 90th day after the date of signing is: _____

The following event or fact will cause the document to take effect in the manner described below:

Execution

The undersigned affirms that the person designated as registered agent in the restated certificate of formation has consented to the appointment. The undersigned signs this document subject to the penalties imposed by law for the submission of a materially false or fraudulent instrument and certifies under penalty of perjury that the undersigned is authorized under the provisions of law governing the entity to execute the filing instrument.

Date: 11-21-16

Concord Robbins Water Supply Corporation

Name of entity (see Execution instructions)

Elaine Trefry

Signature of authorized individual (see instructions)

Elaine Trefry, President

Printed or typed name of authorized individual

Attach the text of the amended and restated certificate of formation to the completed statement form. Identify the attachment as "Restated Certificate of Formation of [Name of Entity]."

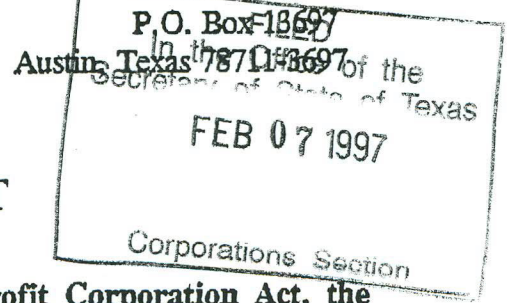
ARTICLE VIII.

The name and street address of each Board Member is:

NAME	ADDRESS	CITY
<u>Elaine Trefry</u>	<u>13034 Hwy. 7 W</u>	<u>Marquez, Texas 77865</u>
<u>Louise Neyland</u>	<u>3417 FM 1147</u>	<u>Marquez, Texas 77865</u>
<u>Richard Morris</u>	<u>6201 CR 428</u>	<u>Marquez, Texas 77865</u>
<u>Kenneth T. Isbell</u>	<u>6504 Hwy. 7 W</u>	<u>Jewett, Texas 75846</u>
<u>Brenda Green</u>	<u>P.O. Box 40</u>	<u>Flynn, Texas 77855</u>

ARTICLE IX

The Corporation is and shall continue to be a Corporation without capital stock, and membership in the Corporation shall be deemed personal estate and shall be transferable only on the books of the Corporation in such manner as the By-Laws may prescribe.



ARTICLE 1396-9.01 REPORT

Pursuant to the provisions of article 9.01 of the Texas Non-Profit Corporation Act, the undersigned corporation hereby files its report setting forth:

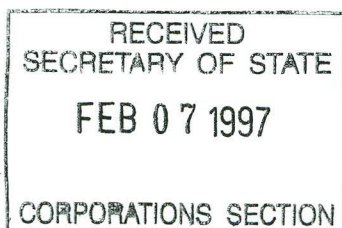
1. The name of the corporation is Concord Robbins Water Supply Corporation
The corporation's charter number is 00498309-1
2. It is incorporated under the laws of The State of Texas
3. The address (including street or building address, city, state, and zip code) of the registered office of the corporation in the state of Texas is P. O. Box 35
Post Office/Community Center Concord, Texas 77850
4. The name of its registered agent at such address is Preston Johnson
5. If the corporation is a foreign corporation, the address of its principal office in the state or country under the laws of which it is incorporated is N/A
6. The names and respective addresses of its directors and officers are:

NAME	ADDRESS (city and state)	OFFICE
<u>Preston Johnson</u>	<u>Rt. 1; Box 172, Jewett, Texas 75846</u>	<u>President</u>
<u>Ruby Lee Speer</u>	<u>P. O. Box 1, Concord, Texas 77850</u>	<u>Sec./Treas.</u>
<u>Virginia Dorsey</u>	<u>Rt. 1, Box 167, Jewett, Texas 75846</u>	<u>Member</u>
<u>Odell T. Green</u>	<u>Rt. 1 Marquez, Texas 77865</u>	<u>Member</u>

7. The foregoing information is given as of the date of the execution of this report.

Dated February 4, 1997.

Concord Robbins Water Supply Corporation



By: Preston Johnson Name of Corporation
Its President, Preston Johnson
Authorized Officer

Jon Niermann, *Chairman*
Emily Lindley, *Commissioner*
Bobby Janecka, *Commissioner*
Toby Baker, *Executive Director*



COPY

TEXAS COMMISSION ON ENVIRONMENTAL QUALITY

Protecting Texas by Reducing and Preventing Pollution

December 4, 2020

Mr. Royce Keeling, President
Southeast WSC
P.O. Box 640
Centerville, Texas 75833-0640

Re: Comprehensive Compliance Investigation at:
Southeast Water Supply Corporation (WSC) System 1, Leon County, Texas
RN101457778, PWS ID No.: 1450027

Dear Mr. Keeling:

On November 19, 2020, Mr. Joseph Hopkins, P.G., of the Texas Commission on Environmental Quality (TCEQ) Waco Region Office conducted an investigation of the above-referenced facility to evaluate compliance with applicable requirements for a public water supply. No violations are being alleged as a result of the investigation; however, please see the enclosed Additional Issues.

The TCEQ appreciates your assistance in this matter and your compliance efforts to ensure protection of the State's environment. If you or members of your staff have any questions regarding these matters, please feel free to contact Mr. Hopkins in the Waco Region Office at (254) 751-0335.

Sincerely,

Richard Monreal

Richard Monreal
Water Section Manager
Waco Region Office

RM/JLH/ed

Enclosure: Summary of Investigation Findings

Summary of Investigation Findings

SOUTHEAST WSC SYSTEM 1

Investigation #

1691137

Investigation Date: 11/19/2020

, LEON COUNTY,

Additional ID(s): 1450027

No Violations Associated to this Investigation

ADDITIONAL ISSUES

Description

Item #1

Additional Comments

Ensure the unused public water supply well, well No. G1450027A, is properly plugged or routinely tested at least once every five years. As required in 30 TAC §290.46(u), abandoned public water supply wells owned by the system must be plugged with cement according to 16 TAC Chapter 76 (relating to Water Well Drillers and Water Well Pump Installers). Wells that are not in use and are non-deteriorated as defined in those rules must be tested every five years or as required by the executive director to prove that they are in a non-deteriorated condition. The test results shall be sent to the executive director for review and approval. Deteriorated wells must be either plugged with cement or repaired to a non-deteriorated condition. Specifically, it was noted during this investigation that Well No. 1 at Plant 1, G1450027A, has been taken out of service on or about July 2019.

Item #2

Ensure the facility Sample Siting Plan is complete and up-to-date, specifically the required distribution system / sampling location map. As required in 30 TAC §290.109(d)(6), all public water systems shall develop and complete a written Sample Siting Plan as described in this paragraph that identifies routine and repeat microbial sampling sites and a sample collection schedule as required by this subsection that are representative of water throughout the distribution system. Sample Siting Plans shall be completed in a format specified by the executive director and are subject to review and revision by the executive director. As required by §290.109(d)(6)(C), the Sample Siting Plan shall include a distribution system map or series of maps which identifies distribution system valves and mains as described in §290.46(n)(2) of this title. The distribution system map shall also include the location of all routine microbial sample sites, water main sizes, entry point source locations, water storage facilities, and any pressure plane boundaries. As required by §290.46(n)(2), an accurate and up-to-date map of the distribution system shall be available so that valves and mains can be easily located during emergencies. At the time of the investigation, it was observed that the Sample Siting Plan may need to be updated with a complete and up-to-date distribution system / sampling location map.

Jon Niermann, *Chairman*
Emily Lindley, *Commissioner*
Bobby Janecka, *Commissioner*
Toby Baker, *Executive Director*



COPY

TEXAS COMMISSION ON ENVIRONMENTAL QUALITY

Protecting Texas by Reducing and Preventing Pollution

December 4, 2020

Mr. Royce Keeling, President
Southeast WSC
P.O. Box 640
Centerville, Texas 75833-0640

Re: Comprehensive Compliance Investigation at:
Southeast Water Supply Corporation (WSC) System 2, Leon County, Texas
RN101232114, PWS ID No.: 1450028

Dear Mr. Keeling:

On November 19, 2020, Mr. Joseph Hopkins, P.G., of the Texas Commission on Environmental Quality (TCEQ) Waco Region Office conducted an investigation of the above-referenced facility to evaluate compliance with applicable requirements for a public water supply. No violations are being alleged as a result of the investigation; however, please see the enclosed Additional Issue.

The TCEQ appreciates your assistance in this matter and your compliance efforts to ensure protection of the State's environment. If you or members of your staff have any questions regarding these matters, please feel free to contact Mr. Hopkins in the Waco Region Office at (254) 751-0335.

Sincerely,

Richard Monreal

Richard Monreal
Water Section Manager
Waco Region Office

RM/JLH/ed

Enclosure: Summary of Investigation Findings

Summary of Investigation Findings

SOUTHEAST WSC SYSTEM 2

Investigation #

1691140

Investigation Date: 11/19/2020

, LEON COUNTY,

Additional ID(s): 1450028

No Violations Associated to this Investigation

ADDITIONAL ISSUES

Description
Item #1

Additional Comments

Ensure the facility Sample Siting Plan is complete and up-to-date, specifically the required distribution system / sampling location map. As required in 30 TAC §290.109(d)(6), all public water systems shall develop and complete a written Sample Siting Plan as described in this paragraph that identifies routine and repeat microbial sampling sites and a sample collection schedule as required by this subsection that are representative of water throughout the distribution system. Sample Siting Plans shall be completed in a format specified by the executive director and are subject to review and revision by the executive director. As required by §290.109(d)(6)(C), the Sample Siting Plan shall include a distribution system map or series of maps which identifies distribution system valves and mains as described in §290.46(n)(2) of this title. The distribution system map shall also include the location of all routine microbial sample sites, water main sizes, entry point source locations, water storage facilities, and any pressure plane boundaries. As required by §290.46(n)(2), an accurate and up-to-date map of the distribution system shall be available so that valves and mains can be easily located during emergencies. At the time of the investigation, it was observed that the Sample Siting Plan may need to be updated with a complete and up-to-date distribution system / sampling location map.

Jon Niermann, *Chairman*
Emily Lindley, *Commissioner*
Bobby Janecka, *Commissioner*
Toby Baker, *Executive Director*



TEXAS COMMISSION ON ENVIRONMENTAL QUALITY

Protecting Texas by Reducing and Preventing Pollution

March 25, 2021

Mr. Royce Keeling, President
Southeast WSC
P.O. Box 640
Centerville, Texas 75833-0640

Re: Comprehensive Compliance Investigation at:
Southeast WSC System 3, Leon County, Texas
RN101230803, PWS ID No.: 1450029

Dear Mr. Keeling:

On March 15, 2021, Ms. Katelyn Mehringer of the Texas Commission on Environmental Quality (TCEQ) Waco Regional Office conducted an investigation of the above-referenced facility to evaluate compliance with applicable requirements for a public water supply. No violations are being alleged as a result of the investigation.

The TCEQ appreciates your assistance in this matter and your compliance efforts to ensure protection of the State's environment. If you or members of your staff have any questions regarding these matters, please feel free to contact Ms. Mehringer in the Waco Regional Office at (254) 751-0335.

Sincerely,

Richard Monreal

Richard Monreal
Water Section Manager
Waco Regional Office

RM/KM/ed

Jon Niermann, *Chairman*
Emily Lindley, *Commissioner*
Bobby Janecka, *Commissioner*
Toby Baker, *Executive Director*



TEXAS COMMISSION ON ENVIRONMENTAL QUALITY

Protecting Texas by Reducing and Preventing Pollution

March 30, 2021

Mr. Royce Keeling, President
Southeast Water Supply Corporation
P.O. Box 640
Centerville, Texas 75833-0640

Re: Comprehensive Compliance Investigation at:
Southeast WSC System 4, Leon County, Texas
Regulated Entity No.: RN104919212, PWS ID No.: 1450031

Dear Mr. Keeling:

On March 22, 2021, Katelyn Mehringer of the Texas Commission on Environmental Quality (TCEQ) Waco Regional Office conducted an investigation of the above-referenced facility to evaluate compliance with applicable requirements for a public water supply. No violations are being alleged as a result of the investigation.

The TCEQ appreciates your assistance in this matter and your compliance efforts to ensure protection of the State's environment. If you or members of your staff have any questions regarding these matters, please feel free to contact Ms. Mehringer in the Waco Regional Office at (254) 751-0335.

Sincerely,

A handwritten signature in black ink, appearing to read "R Monreal".

Richard Monreal
Water Section Manager
Waco Regional Office

RM/KM/ed

Oath for Transferor (Transferring Entity)

STATE OF Texas

COUNTY OF Leon

I, ROYCE KEELING

being duly sworn, file this application for sale,
transfer.

merger, consolidation, acquisition, lease, or
rental, as

Southeast WSC

(owner, member of partnership, title as officer of corporation, or authorized representative)

I attest that, in such capacity, I am qualified and authorized to file and verify such application, am personally familiar with the documents filed with this application, and have complied with all the requirements contained in the application; and, that all such statements made and matters set forth therein with respect to Applicant are true and correct. Statements about other parties are made on information and belief. I further state that the application is made in good faith and that this application does not duplicate any filing presently before the Commission.

I further state that I have been provided with a copy of the 16 TAC § 24.239 Commission rules. I am also authorized to agree and do agree to be bound by and comply with any outstanding enforcement orders of the Texas Commission on Environmental Quality, the Public Utility Commission of Texas or the Attorney General which have been issued to the system or facilities being acquired and recognize that I will be subject to administrative penalties or other enforcement actions if I do not comply.

Royce Keeling

AFFIANT

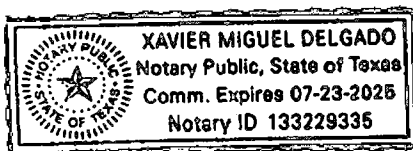
(Utility's Authorized Representative)

If the Affiant to this form is any person other than the sole owner, partner, officer of the Applicant, or its attorney, a properly verified Power of Attorney must be enclosed.

SUBSCRIBED AND SWORN BEFORE ME, a Notary Public in and for the State of Texas

this day the 25 of February 2022

SEAL



Xavier Delgado

NOTARY PUBLIC IN AND FOR THE
STATE OF TEXAS

Xavier Delgado

PRINT OR TYPE NAME OF NOTARY

My commission expires: 07-23-2025

Oath for Transferee (Acquiring Entity)

STATE OF Texas

COUNTY OF Leon

I, Elaine Treffry being duly sworn, file this application for sale, transfer,
merger, consolidation, acquisition, lease, or rental, as Concord-Robbins WSC

(owner, member of partnership, title as officer of corporation, or authorized representative)

I attest that, in such capacity, I am qualified and authorized to file and verify such application, am personally familiar with the documents filed with this application, and have complied with all the requirements contained in the application; and, that all such statements made and matters set forth therein with respect to Applicant are true and correct. Statements about other parties are made on information and belief. I further state that the application is made in good faith and that this application does not duplicate any filing presently before the Commission.

I further state that I have been provided with a copy of the 16 TAC § 24.239 Commission rules. I am also authorized to agree and do agree to be bound by and comply with any outstanding enforcement orders of the Texas Commission on Environmental Quality, the Public Utility Commission of Texas or the Attorney General which have been issued to the system or facilities being acquired and recognize that I will be subject to administrative penalties or other enforcement actions if I do not comply.

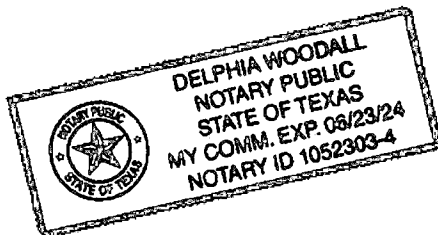
Elaine Treffry
AFFIANT

(Utility's Authorized Representative)

If the Affiant to this form is any person other than the sole owner, partner, officer of the Applicant, or its attorney, a properly verified Power of Attorney must be enclosed.

SUBSCRIBED AND SWORN BEFORE ME, a Notary Public in and for the State of Texas
this day the 28th of FEBRUARY, 20 22

SEAL



Delphia Woodall

NOTARY PUBLIC IN AND FOR THE
STATE OF TEXAS

DELPHIA WOODALL

PRINT OR TYPE NAME OF NOTARY

My commission expires: 6-23-2024

The following files are not convertible:

SOUTHEAST_CCN.cpg
SOUTHEAST_CCN.dbf
SOUTHEAST_CCN.idx
SOUTHEAST_CCN.prj
SOUTHEAST_CCN.sbn
SOUTHEAST_CCN.sbx
SOUTHEAST_CCN.shp

Please see the ZIP file for this Filing on the PUC Interchange in order to access these files.

Contact centralrecords@puc.texas.gov if you have any questions.

The following files are not convertible:

SOUTHEAST_CCN.shp.xml

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SOUTHEAST_FAC.cpg
SOUTHEAST_FAC.dbf
SOUTHEAST_FAC.prj
SOUTHEAST_FAC.sbn
SOUTHEAST_FAC.sbx
SOUTHEAST_FAC.shp

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TRANSFER FROM SOUTHEAST WSC-12180 TO CONCORD ROBBINS WSC- 11717

