



## Filing Receipt

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**DOCKET NO. 53299**

<b>PETITION OF CRYSTAL BLUFF GOAT</b>	<b>§</b>	<b>PUBLIC UTILITY COMMISSION</b>
<b>RANCHES, LLC'S APPEAL OF THE</b>	<b>§</b>	
<b>COST OF OBTAINING SERVICE FROM</b>	<b>§</b>	<b>OF TEXAS</b>
<b>POSSUM KINGDOM WATER SUPPLY</b>	<b>§</b>	
<b>CORPORATION</b>	<b>§</b>	

**COMMISSION STAFF'S FIRST REQUEST FOR INFORMATION  
TO CRYSTAL BLUFF GOAT RANCHES, LLC  
QUESTION NOS. STAFF 1-1 THROUGH STAFF 1-6**

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 Crystal Bluff Goat Ranches, LLC and through its attorney of record, provide the following information and answer the following questions under oath. The questions 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 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. 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: April 29, 2022

Respectfully submitted,  
**PUBLIC UTILITY COMMISSION OF TEXAS  
LEGAL DIVISION**

Keith Rogas  
Division Director

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Managing Attorney

/s/ Merritt Lander  
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**DOCKET NO. 53299**

**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 on April 29, 2022 in accordance with the Order Suspending Rules filed in Project No. 50664.

/s/ Merritt Lander  
Merritt Lander

**DOCKET NO. 53299**

**COMMISSION STAFF'S FIRST REQUEST FOR INFORMATION  
TO CRYSTAL BLUFF GOAT RANCHES, LLC  
QUESTION NOS. STAFF 1-1 THROUGH STAFF 1-6**

**DEFINITIONS**

- 1) "Crystal Bluff" or "you" refers to Crystal Bluff Goat Ranches, LLC and any person acting or purporting to act on their behalf, including without limitation, attorneys, agents, advisors, investigators, representatives, employees, or other persons.
- 2) "Possum Kingdom WSC" refers to Possum Kingdom 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.
- 3) "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 the Crystal Bluff'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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**COMMISSION STAFF'S FIRST REQUEST FOR INFORMATION  
TO CRYSTAL BLUFF GOAT RANCHES, LLC  
QUESTION NOS. STAFF 1-1 THROUGH STAFF 1-6**

**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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**COMMISSION STAFF'S FIRST REQUEST FOR INFORMATION  
TO CRYSTAL BLUFF GOAT RANCHES, LLC  
QUESTION NOS. STAFF 1-1 THROUGH STAFF 1-6**

- Staff 1-1** Please provide a detailed explanation of your issues regarding the cost of obtaining water services from Possum Kingdom WSC. Please describe each issue in a separate paragraph.
- Staff 1-2** Do you believe that the Possum Kingdom WSC's response to your request for water service is unreasonably preferential, prejudicial, and/or discriminatory? If "yes," please explain how.
- Staff 1-3** Please refer to the Appeal of the Cost of Obtaining Service from a Water Supply Corporation (Appeal), filed on March 1, 2022. Specifically, refer to the Possum Kingdom WSC's cost estimate "0.5 MGD WTP Expansion at Existing WTP" (Proposal) document filed as an attachment to the Appeal. Please respond to the following:
- a. Identify any line items in the Proposal that you believe are unreasonable. Explain why the costs of the identified line items are unreasonable.
  - b. Identify any line items in the Proposal that you believe are preferential. Explain why the costs of the identified line items are preferential.
  - c. Identify any line items in the Proposal that you believe are prejudicial. Explain why the costs of the identified line items are prejudicial.
  - d. Identify any line items in the Proposal that you believe are discriminatory. Explain why the costs of the identified line items are discriminatory.
- Staff 1-4** Did you request a cost estimate from any entity other than Possum Kingdom WSC? If "yes," provide a copy of the estimate.
- Staff 1-5** Please estimate the amount of water you intend to use on a monthly basis and explain how you arrived at the estimated number.
- Staff 1-6** Please estimate the number of meters in your development and explain how you arrived at the estimated number.