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

**CRYSTAL BLUFF GOAT RANCHES, LLC'S RESPONSES TO COMMISSION STAFF'S
SECOND REQUESTS FOR INFORMATION**

To: Commission Staff, by and through its attorneys of record, Merritt Lander and Bradley Reynolds, Public Utility Commission of Texas, 1701 N. Congress Avenue, Austin, Texas 78711.

COMES NOW, Crystal Bluff Goat Ranches, LLC, and serve the following Responses to Commission Staff's Second Request for Information to Crystal Bluff Goat Ranches, LLC, and stipulates that the following responses to Commission Staff's Request for Information may be treated by all parties as if the answer was given under oath.

Dated: July 11, 2022.

Respectfully submitted,

DORSETT JOHNSON & SWIFT, LLP

By: /s/ C. Justin Broome

JC Johnson

Texas Bar No. 24067412

Email: jcjohnson@dorsettjohnson.com

C. Justin Broome

Texas Bar No. 24117555

Email: jbroome@dorsettjohnson.com

407 Throckmorton Street Suite 500

Fort Worth, Texas 76102

Tel. (817) 900-8202

Fax. (817) 882-8526

**ATTORNEYS FOR CRYSTAL BLUFF GOAT
RANCHES, LLC**

CERTIFICATE OF SERVICE

I certify that on July 11, 2022, a true and correct copy of the foregoing instrument was served on all counsel parties via their counsel of record.

/s/ C. Justin Broome
C. Justin Broome

**CRYSTAL BLUFF GOAT RANCHES RESPONSES TO COMMISSION STAFF'S
SECOND REQUEST FOR INFORMATION**

Staff 2-1: Please refer to Possum Kingdom WSC's response to RFI Staff 2-2. In its response, Possum Kingdom WSC asserts that there are eight developers who paid contributions in aid of construction (CIAC) in the amount of \$13,385 in the past, based on 0.5 million gallons per day water treatment plant expansion. Is this an accurate representation? If yes, please explain why Crystal Bluff Goat Ranches, LLC, should not pay the same amount as the other developers paid?

Response: CBGR lacks sufficient knowledge to respond to first question of the Commission Staff's Request for Information No. 2-1. Specifically, CBGR does not know whether Possum Kingdom WSC's assertion that eight developers have paid the \$13,385 CIAC fee is an accurate representation. Although, CBGR has no grounds to rebut this assertion, CBGR believes that Possum Kingdom WSC should disclose to the commission whether any developers have been exempted from this CIAC fee or have been offered a discounted CIAC fee since the fee was increased in 2021.

During the course of past dealings with CBGR, Possum Kingdom WSC informed CBGR that no CIAC fees were required because no additional construction would be required for CBGR to tap into the existing water line and sold CBGR three meters without assessing any CIAC fee at all.

CBGR does not believe that it is alone in being assessed these excessive CIAC fees. Rather, CBGR believes the communications with Possum Kingdom WSC tend to show that the CIAC fee is arbitrary and lacks a reasonable basis. Additionally, Possum Kingdom WSC has also failed to offer the Commission a sufficient explanation as to the role of the \$5.05 million in revenue refunding bonds in funding the brick-and-mortar expansion to the water treatment facility, the purpose of the funds, and why the funds were not applied to the expansion to the water treatment facility, which would reduce the burden on developers like CBGR.

Importantly, Possum Kingdom WSC has not shown that this drastically-increased CIAC fee has been consistently applied to **all** developers in the service area since the fee was established by the board – Possum Kingdom WSC has merely shown that it has charged **some** developers the same excessive CIAC fee that it is attempting to charge CBGR.

Sponsored by: Gary Ray, Partner,
Crystal Bluff Goat Ranches, LLC