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DOCKET NO. 53299

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

**COMMISSION STAFF’S FIRST REQUEST FOR INFORMATION
TO POSSUM KINGDOM WATER SUPPLY CORPORATION
QUESTION NOS. STAFF 1-1 THROUGH STAFF 1-8**

Pursuant to 16 Texas Administrative Code (TAC) § 22.144 of the Commission’s Procedural Rules, the Staff (Staff) of the Public Utility Commission of Texas (Commission) requests that Possum Kingdom Water Supply Corporation 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: March 29, 2022

Respectfully submitted,

**PUBLIC UTILITY COMMISSION OF TEXAS
LEGAL DIVISION**

Keith Rogas
Division Director

Robert Dakota Parish
Managing Attorney

/s/ Merritt Lander
Merritt Lander
State Bar No. 24106183
Bradley Reynolds
State Bar No. 24125839
1701 N. Congress Ave.
P.O. Box 13326
Austin, Texas 78711-3326
(512) 936-7307
(512) 936-7268 (Fax)
Brad.Reynolds@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 on March 29, 2022 in accordance with the Order Suspending Rules filed in Project No. 50664.

/s/ Merritt Lander
Merritt Lander

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**COMMISSION STAFF'S FIRST REQUEST FOR INFORMATION
TO POSSUM KINGDOM WATER SUPPLY CORPORATION
QUESTION NOS. STAFF 1-1 THROUGH STAFF 1-8**

DEFINITIONS

- 1) "Possum Kingdom WSC" or "Company" 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.
- 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 Possum Kingdom 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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**COMMISSION STAFF'S FIRST REQUEST FOR INFORMATION
TO POSSUM KINGDOM WATER SUPPLY CORPORATION
QUESTION NOS. STAFF 1-1 THROUGH STAFF 1-8**

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 POSSUM KINGDOM WATER SUPPLY CORPORATION
QUESTION NOS. STAFF 1-1 THROUGH STAFF 1-8**

- Staff 1-1** Has Possum Kingdom WSC ever applied for funding for the system extension/improvement plans? If 'yes', provide any funding received by WSC.
- Staff 1-2** Please provide a copy of Possum Kingdom WSC's bylaws.
- Staff 1-3** In reference to the cost of obtaining water service provided to the Crystal Bluff Goat Ranches, LLC (Appellant), please provide all internal documentation used to calculate the costs, including the following:
- a. All drafts of spreadsheets created by Possum Kingdom WSC related to the calculating/comparing the costs for Appellant to obtain water service;
 - b. All notes from internal Possum Kingdom WSC discussions and meetings related to the cost for Appellant to obtain water service; and
 - c. Any other documents created by Possum Kingdom WSC related to the cost for Appellant to obtain water service.
- Staff 1-4** Will any other customers, present or future, potentially be able to receive service from the line extension/construction proposed to serve Appellant? If "yes," please answer the following:
- a. Will Possum Kingdom WSC reimburse Appellant for a present or future customer's share of the extension cost?
 - b. In reference to Staff 1-4(a), if "yes," please explain, and demonstrate mathematically, how WSC will determine the amount to reimburse Appellant.
- Staff 1-5** Please provide a copy of Possum Kingdom WSC's most recently approved tariff.
- Staff 1-6** Please provide the latest documentation demonstrating the date that written notice of the amount to be paid to obtain water service was provided to the Appellant.
- Staff 1-7** Regarding Appellant's requested water service, please answer the following: what is the purpose of the water service requested, i.e., residential use, commercial use, or other use?
- Staff 1-8** Please provide documentation demonstrating the cost of obtaining service for other similarly situated Possum Kingdom WSC customers over the past years, if any. For purposes of this question, "similarly situated," refers to customers requesting water service for the same purpose (i.e., residential use, commercial use, or other use) and condition (upgrade/improvement on existing water system).