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DOCKET NO. 53487

LESLIE MCFARLAND AND BILLY	§	PUBLIC UTILITY COMMISSION
GRANTHAM'S APPEAL OF THE COST	§	
OF OBTAINING SERVICE FROM	§	OF TEXAS
PARKER WATER SUPPLY	§	
CORPORATION	§	

**COMMISSION STAFF'S FIRST REQUEST FOR INFORMATION
TO PARKER WATER SUPPLY CORPORATION
QUESTION NOS. STAFF 1-1 THROUGH 1-19**

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 Parker Water Supply Corporation (Parker WSC) and through its attorneys 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 question(s) 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 Docket No. 50664.

Dated: May 17, 2022

Respectfully submitted,

**PUBLIC UTILITY COMMISSION OF TEXAS
LEGAL DIVISION**

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/s/ Phillip Lehmann
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DOCKET NO. 53487

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 May 17, 2022, in accordance with the Order Suspending Rules, issued in Project No. 50664.

/s/ Phillip Lehmann
Phillip Lehmann

DOCKET NO. 53487

**COMMISSION STAFF'S FIRST REQUEST FOR INFORMATION
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DEFINITIONS

- 1) "Parker WSC", "the Company," or "you" refers to Parker 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 the Company'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.

DOCKET NO. 53487

**COMMISSION STAFF'S FIRST REQUEST FOR INFORMATION
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QUESTION NOS. STAFF 1-1 THROUGH 1-19**

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
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QUESTION NOS. STAFF 1-1 THROUGH 1-19**

- Staff 1-1** Please provide a detailed explanation as to why a new 3-inch water line is necessary to provide the Appellants with water service.
- Staff 1-2** Indicate whether any future customers will benefit from the upgrade of the 2-inch line to a 3-inch line. If yes, will Parker WSC reimburse the Appellants for the future customer(s) share of the cost?
- Staff 1-3** Please provide a copy of all requests for service from all applicants along County Road 1104C and Parker WSC's responses to them.
- Staff 1-4** Please provide a copy of Parker WSC's distribution system map and include line sizes and the existing connections for each water line.
- Staff 1-5** Please provide a current copy of Parker WSC's bylaws and tariffs, including the standard tap fee to obtain service.
- Staff 1-6** Please provide a copy of the bill of materials and labor costs that support Parker WSC's proposed tap fee.
- Staff 1-7** Reference Staff RFI 1-6; please provide any invoices, receipts, and workorders that support these costs.
- Staff 1-8** Please state if tap installations will be done by Parker WSC's internal employees or by a contractor.
- Staff 1-9** Please identify all water lines that are out of compliance with TCEQ rules in Parker WSC's distribution system.
- Staff 1-10** Please list all water lines that are currently at capacity in Parker WSC's distribution system.
- Staff 1-11** Please provide an engineering study or report that recommends the 2-inch water line near the Appellant's property be replaced or upgraded.
- Staff 1-12** Please provide a breakdown of the \$7,000 estimate provided to the Appellants for water service into the following categories:
- a) labor;
 - b) material;
 - c) equipment;
 - d) insurance; and

e) supervision.

- Staff 1-13** Reference Staff RFI 1-12; please provide a detailed explanation for the cost of insurance and supervision to install the water line.
- Staff 1-14** Please provide a list of all of Parker WSC's employees and indicate whether each employee is paid salary or hourly wages.
- Staff 1-15** Reference Staff RFI 1-14; please identify which Parker WSC employees will be responsible for installing the 3-inch water line which will serve the Appellant's property.
- Staff 1-16** Please provide a detailed list, with prices, of all fees the Appellants are required to pay for water service.
- Staff 1-17** Please provide a detailed list of what fees for water service the Appellants have paid for.
- Staff 1-18** Please provide any capital improvement plans that Parker WSC has.
- Staff 1-19** Please provide any funding applied for or secured for the capital improvement plan.