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DOCKET NO. 54488

APPLICATION OF FOREST GLEN	§	PUBLIC UTILITY COMMISSION
UTILITY COMPANY TO AMEND ITS	§	
CERTIFICATE OF CONVENIENCE	§	OF TEXAS
AND NECESSITY IN MEDINA	§	
COUNTY	§	

**COMMISSION STAFF'S THIRD REQUEST FOR INFORMATION TO
FOREST GLEN UTILITY COMPANY
QUESTION NOS. STAFF 3-1 THROUGH STAFF 3-9**

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 Forest Glen Utility Company, by and through its representative 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 Second Order Suspending Rules in Project No. 50664.

Dated: February 2, 2024

Respectfully submitted,

**PUBLIC UTILITY COMMISSION OF TEXAS
LEGAL DIVISION**

Marisa Lopez Wagley
Division Director

John York Harrison
Senior Managing Attorney

/s/ Cheri Hasz
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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 via electronic mail on February 2, 2024, in accordance with the Second Order Suspending Rules, filed in Project No. 50664.

/s/ Cheri Hasz
Cheri Hasz

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**COMMISSION STAFF'S THIRD REQUEST FOR INFORMATION TO
FOREST GLEN UTILITY COMPANY
QUESTION NOS. STAFF 3-1 THROUGH STAFF 3-9**

DEFINITIONS

- 1) "Forest Glen" or "you" refers to Forest Glen Utility Company 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 your 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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QUESTION NOS. STAFF 3-1 THROUGH STAFF 3-9**

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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Please provide the following:

STAFF 3-1 An updated map showing the location of the 156 connections for the Megan's Landing area, per the developer agreement, within the 210.3 requested acres compared to the 386 connections per the capital improvement plan.

STAFF 3-2 A firm capital commitment such as a developer agreement, nonstandard service agreement, or written guarantee from the developer agreeing to pay for or fund the required collection lines and connections costs for their requested area under 16 TAC § 24.11(e)(5)(B) for:

1. The Potranco Oaks 2 development consisting of 218.8 acres and 500 Living Unit Equivalents (LUEs),
2. The Medina Estates development consisting of 80.1 acres and 115 LUEs, and
3. The Stinson Tract development consisting of 293.7 acres and 700 LUEs.

STAFF 3-3 A timeline for the installation of only the required wastewater collection line and connection cost for improvements for each of the following developments:

1. The Potranco Oaks 2 development consisting of 218.8 acres and 500 LUEs,
2. The Medina Estates development consisting of 80.1 acres and 115 LUEs, and
3. The Stinson Tract development consisting of 293.7 acres and 700 LUEs.

STAFF 3-4 The name of the entity or person who will be paying for the required collection line and connection cost for the following developments:

1. The Potranco Oaks 2 development consisting of 218.8 acres and 500 LUEs,
2. The Medina Estates development consisting of 80.1 acres and 115 LUEs, and
3. The Stinson Tract development consisting of 293.7 acres and 700 LUEs.

STAFF 3-5 The amount of the required capital improvement cost only for the collection line and connection cost for the following developments:

1. The Potranco Oaks 2 development consisting of 218.8 acres and 500 LUEs,
2. The Medina Estates development consisting of 80.1 acres and 115 LUEs, and
3. The Stinson Tract development consisting of 293.7 acres and 700 LUEs.

STAFF 3-6 Admit or deny if Forest Glen has nonstandard service agreements for the following requested areas:

1. The Potranco Oaks 2 development consisting of 218.8 acres and 500 LUEs,
2. The Medina Estates development consisting of 80.1 acres and 115 LUEs, and
3. The Stinson Tract development consisting of 293.7 acres and 700 LUEs.

STAFF 3-7 If deny, explain why nonstandard service agreements have not been obtained for the Potranco Oaks 2, Medina Estates, and Stinson Tract developments and have been obtained for the Potranco West, Microsoft Data Center, and Megan's Landing developments.

STAFF 3-8 Explain why Forest Glen obtained nonstandard service agreements for the Potranco West, Microsoft Data Center, and Megan's Landing developments.

STAFF 3-9 A written guarantee from the developer(s) agreeing to pay for the collection lines and connection cost to provide wastewater service to the Potranco Oaks 2, Medina Estates, and Stinson Tract developments.