



Filing Receipt

Filing Date - 2023-04-17 02:38:00 PM

Control Number - 54617

Item Number - 17

DOCKET NO. 54617

APPLICATION OF TEXAS WATER	§	PUBLIC UTILITY COMMISSION
UTILITIES, L.P. AND SOUTHERN	§	
HORIZONS DEVELOPMENT, INC.	§	OF TEXAS
FOR SALE, TRANSFER, OR MERGER	§	
OF FACILITIES AND CERTIFICATE	§	
RIGHTS IN LIBERTY AND	§	
MONTGOMERY COUNTIES	§	

**TEXAS WATER UTILITIES, L.P.'S RESPONSE TO COMMISSION STAFF'S
FIRST REQUEST FOR INFORMATION**

To: Public Utility Commission of Texas (Commission), by and through its attorney of record, Margaux Fox, Legal Division, 1701 N. Congress Avenue, P.O. Box 13326, Austin, Texas 78701

Texas Water Utilities, L.P. (TWU) files its responses to Public Utility Commission of Texas (Commission) Staff's First Request for Information (RFI) to TWU received on March 27, 2023. This response is timely filed. Pursuant to 16 Texas Administrative Code (TAC) § 22.144(c)(2)(F), TWU agrees and stipulates that all parties may treat the responses as if the answers were filed under oath.

Respectfully submitted,

SPENCER FANE, LLP
816 Congress Avenue, Suite 1200
Austin, TX 78701
Telephone: (512) 840-4550
Facsimile: (512) 840-4551

/s/ William A. Faulk, III

William A. Faulk, III
State Bar No. 24075674
cfaulk@spencerfane.com
Rashmin J. Asher
State Bar No. 24092058
rasher@spencerfane.com
Eleanor H. D'Ambrosio
State Bar No. 24097559
edambrosio@spencerfane.com

Taylor P. Denison
State Bar No. 24116344
tdenison@spencerfane.com

**ATTORNEYS FOR TEXAS WATER
UTILITIES, L.P.**

CERTIFICATE OF SERVICE

I hereby 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 April 17, 2023, in accordance with the Order Suspending Rules, issued in Project No. 50664.

/s/ William A. Faulk, III

William A. Faulk, III

DOCKET NO. 54617

**TWU'S RESPONSE TO
COMMISSION STAFF'S FIRST RFI**

Staff 1-1 Please see Part F of the application and provide answers to questions 24, 25, 26, and 27 as it relates to Southern Crossing Water.

RESPONSE: Please see the responses to questions 24, 25, 26, & 27 for Southern Oaks water system. The responses to these questions are identical for Southern Crossing water system but were inadvertently not included in the initial application. The responses applicable to both systems are as follows:

- 24.A. No
- 24.B. N/A
- 24.C. No
- 25. No
- 26.A. No
- 26.B. No
- 26.C. N/A
- 26.D. N/A
- 27. Yes

Prepared by: Brian Bahr
Sponsor: Brian Bahr

DOCKET NO. 54617

**TWU'S RESPONSE TO
COMMISSION STAFF'S FIRST RFI**

Staff 1-2 Please address the three TCEQ Central Registry violations dated 9/12/2022 for the Southern Oaks Water System Phase 2 (PWS 1460150) as relating to well capacity and sampling.

RESPONSE: On August 15, 2022, a video of the pump test performed at Southern Oaks demonstrating sufficient capacity was sent to TCEQ, and TCEQ confirmed receipt of the video the same day. TCEQ has communicated that all violations have been resolved and has not requested any additional information be provided. TWU reserves the right to supplement this response if and when additional information becomes available.

Prepared by: Brian Bahr

Sponsor: Brian Bahr