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DOCKET NO. 55783

STACIE SMITH'S APPEAL OF THE	§	PUBLIC UTILITY COMMISSION
COST OF OBTAINING SERVICE	§	
FROM LIBERTY CITY WATER	§	OF TEXAS
SUPPLY CORPORATION	§	

**COMMISSION STAFF'S FIRST REQUEST FOR INFORMATION TO
LIBERTY CITY WATER SUPPLY CORPORATION
QUESTION NOS. STAFF 1-1 THROUGH STAFF 1-5**

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 Park Water 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: January 29, 2024

Respectfully submitted,

**PUBLIC UTILITY COMMISSION OF TEXAS
LEGAL DIVISION**

Marisa Lopez Wagley
Division Director

Ian Groetsch
Managing Attorney

/s/ Kelsey Daugherty
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ERROR! REFERENCE SOURCE NOT FOUND.

CERTIFICATE OF SERVICE

I certify that unless otherwise ordered by the presiding officer, notice of the filing of this document will be provided to all parties of record via electronic mail on January 29, 2024, in accordance with the Second Order Suspending Rules, filed in Project No. 50664.

/s/ Kelsey Daugherty
Kelsey Daugherty

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QUESTION NOS. STAFF 1-1 THROUGH STAFF 1-5**

DEFINITIONS

- 1) "Liberty City WSC" or "you" refers to Liberty City 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 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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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 1-1 Please provide an itemized cost for the full cost to obtain service (\$4,003).

STAFF 1-2 Based on all new residential service requests received after October 28, 2019, how many applicants for new service did Liberty City WSC charge the Equity Buy-In Fees and Installation Fee?

STAFF 1-3 Please admit or deny that Liberty City WSC has not amended its tariff since March 2019.

STAFF 1-4 If the response to Staff 1-3 is "admit," given that Liberty City WSC's tariff has not been amended since March 2019, please explain in detail why the cost to obtain service for the second garage apartment (unit 2) in 2023 is significantly higher than the cost to obtain service for the first garage apartment in 2019.

STAFF 1-5 Please explain why Liberty City WSC did not charge Ms. Smith the Equity Buy-In Fee and Installation Fee back in 2019 but is charging these fees now.