



Filing Receipt

Filing Date - 2024-02-11 11:01:18 AM

Control Number - 55783

Item Number - 14

PUC DOCKET NO. 55783

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

STACIE SMITH'S RESPONSE TO REQUEST FOR INFORMATION
QUESTION NOS. STAFF 1-1 THROUGH 1-3

Stacie Smith files this response to Commission Staff's First Request for information. Stacie Smith stipulates that responses to requests for information can be treated by all parties as if the answers were filed under oath.

STAFF 1-1

Please admit if you are requesting a waiver to 16 Texas Administrative Code (TAC) § 24.169(a)(4) which reads as follows:

One meter is required for each residential, commercial, or industrial service connection. An apartment building, condominium, manufactured housing community, or mobile home park may be considered by the utility to be a single commercial facility for the purpose of these sections. The commission may grant an exception to the individual meter requirement if the plumbing of an existing multiple use or multiple occupant building would prohibit the installation of individual meters at a reasonable cost or would result in unreasonable disruption of the customary use of the property.

Stacie Smith responds as follows:

Stacie Smith denies that her original petition is requesting a waiver to 16 Texas Administrative Code (TAC) § 24.169(a)(4) because the PUC lacks jurisdiction. (See Docket No. 45034 – Order No. 2: Order of Dismissal) As a water supply corporation, Liberty City Water Supply Corporation is specifically excluded from the definition of a “water and sewer utility” pursuant to 16 TAC § 24.3(54).

Stacie Smith's petition to the PUC of Texas contests the **cost of obtaining new service** from Liberty city WSC under Texas Water Code (TWC) § 13.43(g).

STAFF 1-2

Please state the rule that grants a waiver to 16 TAC § 24.169(a)(4) or reference a PUC Docket Number(s) where an exception was granted to the individual meter requirement per 16 TAC § 24.169(a)(4).

Stacie Smith responds as follows:

There is no rule that grants a waiver to the individual meter requirement because water supply corporations are specifically excluded from the definition of a “water and sewer utility” pursuant to 16 TAC § 24.3(54). PUC Docket No. 45034 – Order No. 2 dismissed a petition for an exception to the individual meter requirement because “the Commission does not have the authority to grant an exception to the individual meter requirement for customers of water supply corporations.”

STAFF 1-3

Please explain in detail how your situation qualifies for an exception as explained in 16 TAC § 24.169(a)(4).

Stacie Smith responds as follows:

Liberty City Water Supply Corporation is exempt from the Public Utility Commission of Texas regulations; therefore, I (Stacie Smith) am compelled to follow the tariff of this sole water provider to my property.

**ADDITIONAL INFORMATION REGARDING ORIGINAL PETITION AGAINST
COST OF OBTAINING SERVICE**

Comparable Cost:

City of Kilgore, Texas (postal city of the town of Liberty City)

Cost of obtaining new service for individual unit of a duplex: \$0

Individual meter is NOT required by the city of Kilgore for duplex
(consistent with the PUC’s waiver for multi-unit building)

Per: Amy Sander, City of Kilgore
(Appendix A – email response regarding NO second meter
required)

Liberty City Water Supply Corporation

Cost of obtaining new service for individual unit of a duplex: \$4,003

Dated: February 9, 2024

Respectfully submitted,

Stacie Smith

2024/02/09

STACIE SMITH
2800 Stone Road
Kilgore, TX 75662
903-399-8433

Appendix A

City of Kilgore email



Stacie Smith <stacie.f.smith@gmail.com>

Water meter question

Amy Sander <amy.sander@cityofkilgore.com>
To: Stacie Smith <stacie.f.smith@gmail.com>

Fri, Feb 9, 2024 at 4:05 PM

This is definitely more efficient. lol If you pay the bill, you can leave it on one meter. If you want the tenants to pay, then you'll need to get a second meter.

Amy Sander
Utility Billing Coordinator
815 N Kilgore St
(903)988-4104

On Fri, Feb 9, 2024 at 4:01 PM Stacie Smith <stacie.f.smith@gmail.com> wrote:
Hi Amy,

This may be easier than phone tag!

If I purchase a duplex with a single water meter in Kilgore, does the city require that I install a second meter (if the second unit is rented to a different party)? Or may I pay the combined water bill?

Thank you!
Stacie Smith