



## **Filing Receipt**

**Filing Date - 2024-11-05 03:52:43 PM**

**Control Number - 56520**

**Item Number - 26**

**SOAH DOCKET NO. 473-25-02250.WS  
PUC DOCKET NO. 56520**

<b>COMPLAINT OF DANIEL DEWEBER AND PRAIRIE BRANCH PROPERTIES LLC AGAINST AMON CARTER LAKE WATER SUPPLY CORPORATION</b>	§ § § § §	<b>BEFORE THE STATE OFFICE  OF ADMINISTRATIVE HEARINGS</b>
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**AMON CARTER LAKE WATER SUPPLY CORPORATION RESPONSE TO  
DANIEL DEWEBER AND PRAIRIE BRANCH PROPERTIES LLC's  
FIRST REQUEST FOR INFORMATION**

TO: Daniel Deweber and Prairie Branch Properties LLC, by and through their attorneys of record, William Knowlton and Diane Knowlton, Knowlton Firm, P.O. Box 607, Henrietta, Texas 76365 and Tyler J. Ryska and David C. Lawrence, Rigby Slack, PLLC, 3500 Jefferson Street, Suite 330, Austin, Texas 78731

COMES NOW Amon Carter Lake Water Supply Corporation and files these Responses to Daniel Deweber and Prairie Branch Properties LLC First Request for Information to Amon Carter Lake Water Supply Corporation. As the Parties entered into a Rule 11 Agreement regarding the responsive date, this response is timely filed.

Respectfully submitted,

**Messer & Fort, PLLC**  
4201 W. Parmer Lane, Suite C-150  
Austin, Texas 78727  
(512) 600-2308  
(972) 668-6414 (Fax)

/s/ Arturo D. Rodriguez, Jr.  
ARTURO D. RODRIGUEZ, JR.  
State Bar No. 00791551

**ATTORNEY FOR AMON CARTER LAKE  
WATER SUPPLY CORPORATION**

### **CERTIFICATE OF SERVICE**

I hereby certify that on the 5th day of November 2024, a true and correct copy of the foregoing document was served on all parties in accordance with PUC Procedural Rule 22.74.

/s/ Arturo D. Rodriguez, Jr.

Arturo D. Rodriguez, Jr.

William Knowlton  
State Bar No. 11627500  
Diane Knowlton  
State Bar No. 24104242  
Knowlton Firm  
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Rigby Slack, PLLC  
3500 Jefferson Street  
Suite 330  
Austin, Texas 78731

**SOAH DOCKET NO. 473-25-02250. WS  
PUC DOCKET NO. 56520**

<b>COMPLAINT OF DANIEL</b>	<b>§</b>	<b>PUBLIC UTILITY COMMISSION</b>
<b>DEWEBER AND PRAIRIE BRANCH</b>	<b>§</b>	
<b>PROPERTIES LLC AGAINST AMON</b>	<b>§</b>	<b>OF TEXAS</b>
<b>CARTER LAKE WATER SUPPLY</b>	<b>§</b>	
<b>CORPORATION</b>	<b>§</b>	

**AMON CARTER LAKE WATER SUPPLY CORPORATION RESPONSE TO**  
**DANIEL DEWEBER AND PRAIRIE BRANCH PROPERTIES LLC's**  
**FIRST REQUEST FOR INFORMATION**

**RFI 1-1**      Produce all correspondence between You and the Complainants related to Complainants' requests for water service for the Property.

**RESPONSE:**

In addition to the items posted and equally available to the complainant that appear on the Public Utility Commission of Texas's Interchange Filing System, responsive documents can be downloaded from the following website for the next thirty days:

<https://www.dropbox.com/scl/fo/hpyhu1g1f9u1vsq2ldnnz/AGYUY078EP1SSuOLQsIRT-g?rlkey=50dtcso7uxr6xny9e3o0ckc2e&st=90xrd667&dl=0>

Prepared by: John Halbrook  
Sponsored by: Will be supplemented

**SOAH DOCKET NO. 473-25-02250. WS  
PUC DOCKET NO. 56520**

<b>COMPLAINT OF DANIEL</b>	<b>§</b>	<b>PUBLIC UTILITY COMMISSION</b>
<b>DEWEBER AND PRAIRIE BRANCH</b>	<b>§</b>	
<b>PROPERTIES LLC AGAINST AMON</b>	<b>§</b>	<b>OF TEXAS</b>
<b>CARTER LAKE WATER SUPPLY</b>	<b>§</b>	
<b>CORPORATION</b>	<b>§</b>	

**AMON CARTER LAKE WATER SUPPLY CORPORATION RESPONSE TO**  
**DANIEL DEWEBER AND PRAIRIE BRANCH PROPERTIES LLC's**  
**FIRST REQUEST FOR INFORMATION**

**RFI 1-2**      Produce all documents relating to Complainants' requests for water service for the Property.

**RESPONSE:**

In addition to the items posted and equally available to the complainant that appear on the Public Utility Commission of Texas's Interchange Filing System, responsive documents can be downloaded from the following website for the next thirty days:

<https://www.dropbox.com/scl/fo/hpyhu1g1f9u1vsq2ldnnz/AGYUY078EPISuOLQsIRT-g?rlkey=50dtcso7uxr6xny9e3o0ckc2e&st=90xrd667&dl=0>

Further, see documents produced in response to RFI 1-1, above.

Prepared by: John Halbrook  
Sponsored by: Will be supplemented

**SOAH DOCKET NO. 473-25-02250. WS  
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<b>COMPLAINT OF DANIEL DEWEBER AND PRAIRIE BRANCH PROPERTIES LLC AGAINST AMON CARTER LAKE WATER SUPPLY CORPORATION</b>	§ § § § §	<b>PUBLIC UTILITY COMMISSION  OF TEXAS</b>
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**AMON CARTER LAKE WATER SUPPLY CORPORATION RESPONSE TO  
DANIEL DEWEBER AND PRAIRIE BRANCH PROPERTIES LLC's  
FIRST REQUEST FOR INFORMATION**

**RFI 1-3**      Produce copies of all Your Tarriffs which have been in effect since January 1, 2020.

**RESPONSE:**

Responsive documents can be downloaded from the following website for the next thirty days:

<https://www.dropbox.com/scl/fo/hpyhu1g1f9u1vsq2ldnnz/AGYUY078EP1SSuOLQsIRT-g?rlkey=50dtcs07uxr6xny9e3o0ckc2e&st=90xrd667&dl=0>

Prepared by: John Halbrook  
Sponsored by: Will be supplemented

**SOAH DOCKET NO. 473-25-02250. WS  
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<b>COMPLAINT OF DANIEL</b>	<b>§</b>	<b>PUBLIC UTILITY COMMISSION</b>
<b>DEWEBER AND PRAIRIE BRANCH</b>	<b>§</b>	
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<b>CARTER LAKE WATER SUPPLY</b>	<b>§</b>	
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**AMON CARTER LAKE WATER SUPPLY CORPORATION RESPONSE TO**  
**DANIEL DEWEBER AND PRAIRIE BRANCH PROPERTIES LLC's**  
**FIRST REQUEST FOR INFORMATION**

**RFI 1-4**      Produce all documents You submitted to the PUC relating to Complainants' requests for water service for the Property.

**RESPONSE:**

In addition to the items posted and equally available to the complainant that appear on the Public Utility Commission of Texas's Interchange Filing System, see documents responsive to RFI 1-2, above.

Prepared by: John Halbrook  
Sponsored by: Will be supplemented

**SOAH DOCKET NO. 473-25-02250. WS  
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<b>COMPLAINT OF DANIEL</b>	<b>§</b>	<b>PUBLIC UTILITY COMMISSION</b>
<b>DEWEBER AND PRAIRIE BRANCH</b>	<b>§</b>	
<b>PROPERTIES LLC AGAINST AMON</b>	<b>§</b>	<b>OF TEXAS</b>
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<b>CORPORATION</b>	<b>§</b>	

**AMON CARTER LAKE WATER SUPPLY CORPORATION RESPONSE TO**  
**DANIEL DEWEBER AND PRAIRIE BRANCH PROPERTIES LLC's**  
**FIRST REQUEST FOR INFORMATION**

**RFI 1-5**      Produce all correspondence between You and the PUC relating to Complainants' requests for water service for the Property.

**RESPONSE:**

See documents produced in response to other RFIs requested herein.

Prepared by: John Halbrook

Sponsored by: Will be supplemented



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<b>COMPLAINT OF DANIEL DEWEBER AND PRAIRIE BRANCH PROPERTIES LLC AGAINST AMON CARTER LAKE WATER SUPPLY CORPORATION</b>	<b>§ § § § §</b>	<b>PUBLIC UTILITY COMMISSION  OF TEXAS</b>
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**AMON CARTER LAKE WATER SUPPLY CORPORATION RESPONSE TO  
DANIEL DEWEBER AND PRAIRIE BRANCH PROPERTIES LLC's  
FIRST REQUEST FOR INFORMATION**

**RFI 1-6**      Produce all Your internal communications relating to Complainants' requests for water service for the Property.

**RESPONSE:**

See documents produced in response to other RFIs requested herein.

Prepared by: John Halbrook  
Sponsored by: Will be supplemented

**SOAH DOCKET NO. 473-25-02250. WS  
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<b>COMPLAINT OF DANIEL</b>	<b>§</b>	<b>PUBLIC UTILITY COMMISSION</b>
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**AMON CARTER LAKE WATER SUPPLY CORPORATION RESPONSE TO**  
**DANIEL DEWEBER AND PRAIRIE BRANCH PROPERTIES LLC's**  
**FIRST REQUEST FOR INFORMATION**

**RFI 1-7**      Produce all documents relating to any action taken by the ACLWSC board of directors relating to Complainants' requests for water service for the Property.

**RESPONSE:**

See documents produced in response to other RFIs requested herein.

Prepared by: John Halbrook  
Sponsored by: Will be supplemented

**SOAH DOCKET NO. 473-25-02250. WS  
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<b>COMPLAINT OF DANIEL DEWEBER AND PRAIRIE BRANCH PROPERTIES LLC AGAINST AMON CARTER LAKE WATER SUPPLY CORPORATION</b>	<b>§ § § § §</b>	<b>PUBLIC UTILITY COMMISSION  OF TEXAS</b>
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**AMON CARTER LAKE WATER SUPPLY CORPORATION RESPONSE TO  
DANIEL DEWEBER AND PRAIRIE BRANCH PROPERTIES LLC's  
FIRST REQUEST FOR INFORMATION**

**RFI 1-8**      Produce all applications for water service submitted to You by the Complainants.

**RESPONSE:**

See documents produced in response to other RFIs requested herein.

Prepared by: John Halbrook  
Sponsored by: Will be supplemented

**SOAH DOCKET NO. 473-25-02250. WS  
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<b>COMPLAINT OF DANIEL DEWEBER AND PRAIRIE BRANCH PROPERTIES LLC AGAINST AMON CARTER LAKE WATER SUPPLY CORPORATION</b>	<b>§ § § § §</b>	<b>PUBLIC UTILITY COMMISSION  OF TEXAS</b>
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**AMON CARTER LAKE WATER SUPPLY CORPORATION RESPONSE TO  
DANIEL DEWEBER AND PRAIRIE BRANCH PROPERTIES LLC's  
FIRST REQUEST FOR INFORMATION**

**RFI 1-9**      Produce all cost estimates related to providing water service to the Property.

**RESPONSE:**

See documents provided in response to RFI 1-11.

Prepared by: John Halbrook

Sponsored by: Will be supplemented

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<b>COMPLAINT OF DANIEL DEWEBER AND PRAIRIE BRANCH PROPERTIES LLC AGAINST AMON CARTER LAKE WATER SUPPLY CORPORATION</b>	<b>§ § § § §</b>	<b>PUBLIC UTILITY COMMISSION  OF TEXAS</b>
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**AMON CARTER LAKE WATER SUPPLY CORPORATION RESPONSE TO  
DANIEL DEWEBER AND PRAIRIE BRANCH PROPERTIES LLC's  
FIRST REQUEST FOR INFORMATION**

**RFI 1-10**      Produce all engineering reports related to providing water service to the Property.

**RESPONSE:**

See documents provided in response to RFI 1-11.

Prepared by: John Halbrook

Sponsored by: Will be supplemented

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<b>COMPLAINT OF DANIEL DEWEBER AND PRAIRIE BRANCH PROPERTIES LLC AGAINST AMON CARTER LAKE WATER SUPPLY CORPORATION</b>	<b>§ § § § §</b>	<b>PUBLIC UTILITY COMMISSION  OF TEXAS</b>
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**AMON CARTER LAKE WATER SUPPLY CORPORATION RESPONSE TO  
DANIEL DEWEBER AND PRAIRIE BRANCH PROPERTIES LLC's  
FIRST REQUEST FOR INFORMATION**

**RFI 1-11**      Produce all correspondence between You and any engineer related to providing water service to the Property.

**RESPONSE:**

Responsive documents, not subject to privilege, can be downloaded from the following website for the next thirty days:

<https://www.dropbox.com/scl/fo/hpyhu1g1f9u1vsq2ldnnz/AGYUY078EP1SSuOLQsIRT-g?rlkey=50dtcso7uxr6xny9e3o0ckc2e&st=90xrd667&dl=0>

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**AMON CARTER LAKE WATER SUPPLY CORPORATION RESPONSE TO  
DANIEL DEWEBER AND PRAIRIE BRANCH PROPERTIES LLC's  
FIRST REQUEST FOR INFORMATION**

**RFI 1-12**      Produce all correspondence between You and any third party related to providing water service to the Property.

**RESPONSE:**

See documents, not subject to privilege, produced in response to other RFIs requested herein.

Prepared by: John Halbrook  
Sponsored by: Will be supplemented