



## **Filing Receipt**

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**Item Number - 3**

**DOCKET NO. 58083**

<b>APPLICATION OF YANCEY WATER</b>	<b>§</b>	<b>PUBLIC UTILITY COMMISSION</b>
<b>SUPPLY CORPORATION AND RIO</b>	<b>§</b>	
<b>MEDINA WATER SUPPLY</b>	<b>§</b>	<b>OF TEXAS</b>
<b>CORPORATION FOR SALE,</b>	<b>§</b>	
<b>TRANSFER, OR MERGER OF</b>	<b>§</b>	
<b>FACILITIES AND CERTIFICATE</b>	<b>§</b>	
<b>RIGHTS IN MEDINA AND BEXAR</b>	<b>§</b>	
<b>COUNTIES</b>	<b>§</b>	

**COMMISSION STAFF'S FIRST REQUEST FOR INFORMATION TO  
YANCEY WATER SUPPLY CORPORATION  
QUESTION NOS. STAFF 1-1 THROUGH 1-7**

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 Yancey Water Supply Corporation 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: June 4, 2025

Respectfully submitted,

**PUBLIC UTILITY COMMISSION OF TEXAS  
LEGAL DIVISION**

Marisa Lopez Wagley  
Division Director

/s/ David Berlin  
David Berlin  
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**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 June 4, 2025, in accordance with the Second Order Suspending Rules, issued in Project No. 50664.

/s/ David Berlin  
David Berlin

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**COMMISSION STAFF'S FIRST REQUEST FOR INFORMATION TO  
YANCEY WATER SUPPLY CORPORATION  
QUESTION NOS. STAFF 1-1 THROUGH 1-7**

**DEFINITIONS**

- 1) "Yancey WSC" or "you" refers to Yancey 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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**COMMISSION STAFF'S FIRST REQUEST FOR INFORMATION TO  
YANCEY WATER SUPPLY CORPORATION  
QUESTION NOS. STAFF 1-1 THROUGH 1-7**

**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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**COMMISSION STAFF'S FIRST REQUEST FOR INFORMATION TO  
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QUESTION NOS. STAFF 1-1 THROUGH 1-7**

**Emergency Preparedness Plans & Critical Facilities**

The items requested below stem from new statutes. Responses to these items may be filed confidentially:

**Staff 1-1** Under Texas Water Code (TWC) § 13.1396(b), “An affected utility shall submit to the office of emergency management of each county in which the utility has more than one customer, the utility commission, and the office of emergency management of the governor a copy of:

- 1) the affected utility's emergency preparedness plan approved under Section 13.1395; and
- 2) the utility commission's notification to the affected utility that the plan is accepted.”

Please see new emergency preparedness plan (EPP) requirements on the Texas Commission on Environmental Quality (TCEQ) website at:

[https://www.tceq.texas.gov/drinkingwater/homeland\\_security/disasterprep/epp](https://www.tceq.texas.gov/drinkingwater/homeland_security/disasterprep/epp)

Please file one of the following in response:

- A. A statement that a copy of Yancey WSC's approved EPP has been filed in Project No. 52272,
- B. Proof that the EPP has been submitted to the TCEQ for approval, or
- C. A copy of the waiver approval or proof that a request for waiver of the EPP requirement from the TCEQ, under Texas Water Code § 13.1395(j), has been submitted.

**Staff 1-2** Under TWC § 13.1396(c) “Each affected utility shall submit to the utility commission, each electric utility that provides transmission and distribution service

to the affected utility, each retail electric provider that sells electric power to the affected utility, the office of emergency management of each county in which the utility has water and wastewater facilities that qualify for critical load status under rules adopted by the utility commission, and the division of emergency management of the governor:

- 1) information identifying the location and providing a general description of all water and wastewater facilities that qualify for critical load status; and
- 2) emergency contact information for the affected utility, including:
  - a. the person who will serve as a point of contact and the person's telephone number;
  - b. the person who will serve as an alternative point of contact and the person's telephone number; and
  - c. the affected utility's mailing address.”

Please file a list of the information requested in TWC § 13.1396(c) for Yancey WSC in Project No. 53938.

**Capital Improvement Plan (expanded from Question 10 of the application)**

**Staff 1-3** If the infrastructure is not already in place or if existing infrastructure needs repairs and improvements to provide continuous and adequate service to the requested area, a capital improvement plan, including a budget and an estimated timeline for construction of all facilities necessary to provide full service to the requested area, keyed to a map showing where such facilities will be located to provide service is required. Please provide the following for improvements to be installed or contemplated for installation by the applicant:

- A.** an itemized list of the capital improvements or repairs;
- B.** a budget or costs allocated for each capital improvement or repair;
- C.** an estimated timeline for construction of all facilities to provide full service to the requested area;
- D.** a keyed map showing where facilities will be located to provide service; and

E. a description of the sources of funding for all facilities.

**Staff 1-4** If a developer<sup>1</sup> or developers are financially responsible for a portion of improvements, in conjunction with the applicant, which are necessary to provide full service to the requested area, please provide the following:

- A. an itemized list of capital improvements or repairs;
- B. a budget or costs allocated for each capital improvement or repair;
- C. an estimated timeline for construction of all facilities to provide full service to the requested area;
- D. a keyed map showing where facilities will be located to provide service;
- E. a description of the sources of funding for all facilities.

**Initial Rates**

**Staff 1-5** In providing your response to this Request for Information, please refer to and utilize the “Rate Change Form” attached hereto as Attachment A. Please provide a rate schedule showing the existing rates and the requested authorized acquisition rates.

**Staff 1-6** Please provide the applicable website, phone number, and email address that customers may utilize for any questions they may have regarding the changing rate.

**Staff 1-7** Provide a billing comparison for usage of 5,000 and 10,000 gallons at existing rates and the requested authorized acquisition rates.

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<sup>1</sup> *Application of Green Valley Special Utility District to Amend its Certificate of Convenience and Necessity in Guadalupe County*, Docket No. 56244, Chairman Thomas Gleeson Memorandum (Feb. 19, 2025).



# NOTICE OF PROPOSED RATE CHANGE – WATER

**If applicable, list any bill payment assistance programs to low income ratepayers.**