



## **Filing Receipt**

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**Control Number - 58098**

**Item Number - 6**

**DOCKET NO. 58098**

<b>APPLICATION OF T&amp;W WATER</b>	<b>§</b>	<b>PUBLIC UTILITY COMMISSION</b>
<b>SERVICE COMPANY DBA BLUE</b>	<b>§</b>	
<b>TOPAZ UTILITIES AND INLINE</b>	<b>§</b>	<b>OF TEXAS</b>
<b>UTILITIES, LLC FOR SALE,</b>	<b>§</b>	
<b>TRANSFER, OR MERGER OF</b>	<b>§</b>	
<b>FACILITIES AND CERTIFICATE</b>	<b>§</b>	
<b>RIGHTS IN HARRIS COUNTY</b>	<b>§</b>	

**COMMISSION STAFF'S FIRST REQUEST FOR INFORMATION TO  
T&W WATER SERVICE COMPANY DBA BLUE TOPAZ UTILITIES AND INLINE  
UTILITIES  
QUESTION NOS. STAFF 1-1 THROUGH STAFF 1-9**

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 T&W Water Service Company dba Blue Topaz Utilities and Inline Utilities 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 9, 2025

Respectfully submitted,

**PUBLIC UTILITY COMMISSION OF TEXAS  
LEGAL DIVISION**

Marisa Lopez Wagley  
Division Director

Andy Aus  
Managing Attorney

/s/ Anthony Kanalas  
Anthony Kanalas  
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**CERTIFICATE OF SERVICE**

I 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 June 9, 2025 in accordance with the Second Order Suspending Rules, issued in Project No. 50664.

/s/ Anthony Kanalas  
Anthony Kanalas

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**DEFINITIONS**

- 1) "T&W Water Service Company" or "you" refers to &W Water Service Company dba Blue Topaz Utilities and Inline Utilities 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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QUESTION NOS. STAFF 1-1 THROUGH STAFF 1-9**

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

**Staff 1-1** 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:

Provide supplemental data referencing Attachment 1 and 10 provided in the application to ensure each category below is adequately addressed:

- 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.

**Texas Commission on Environmental Quality (TCEQ)**

**Staff 1-2** Please see question 22. B of the application and confirm that the wastewater transfer permit request has been submitted to the TCEQ. Proof of submittal of the transfer request to the TCEQ must be filed in the record prior to the order approving the sale to go forward in this docket.

**Staff 1-3** Please point to the location in the record or provide the TCEQ comprehensive compliance investigation for the Cottage Gardens Public Water System, (PWS) ID No. 1013271, dated July 11, 2023.

**Staff 1-4** Please point to the location in the record or provide the TCEQ comprehensive compliance investigation for the Inline Utilities Wastewater Treatment Plant (WWTP) under discharge permit no. WQ0013942001 dated January 7, 2020.

**Fair Market Value**

Please provide the following:

**Staff 1-5** Invoices from Steven McDonald for services performed and proof of payment,

- Staff 1-6**      The executed service agreement with the engineering firm,
- Staff 1-7**      Proof of payments to the engineering firm,
- Staff 1-8**      Exhibit A for the service agreements with Kyle R. Schroder and Joseph E. Batis,  
and
- Staff 1-9**      Proof of payments to each of the appraisers.