

SAWS Act PAC

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July 15, 2020

To Whom It May Concern
Open Records Center
San Antonio Water System
Submitted via OpenRecords@saws.org

Dear Sir or Madam:

Under the Texas Public Information Act, I submit this request for public information.

Please provide a cost estimate *before* processing this request, including specifying the costs if the information is provided on a flash drive or as hard copies. I am willing to accept a combination of electronic and hard copy files if such a combination reduces costs. An email response may be sent to reINETTE3@gmail.com.

For purposes of this request:

- A) "Vista Ridge" includes any employee, member, consultant, attorney, and/or agent of Vista Ridge LLC or any of its related or predecessor entities, including without limitation the following entities: Blue Water Vista Ridge LLC, Blue Water Systems, Metropolitan Water Company, Metropolitan Water Company LP, Metropolitan Water Company of Texas LLC, Ali 10/96 Operating Company LP, Metropolitan Water Resources, Metropolitan Water Resources LP, Metropolitan Water Development LP, Metropolitan Water Resources of Texas LLC, Garney Construction, Garney Companies Inc., Garney P3 LLC, EPCOR Utilities, Inc. and/or Central Texas Regional Water Supply Corporation.
- B) "SAWS" includes any trustee, employee, member, consultant, attorney, and/or agent of the San Antonio Water System or the City of San Antonio.
- C) "TCEQ" includes any commissioner, employee, member, consultant, attorney, and/or agent of the Texas Commission for Environmental Quality.
- D) "WTPA" means the Vista Ridge Regional Supply Project Water Transmission and Purchase Agreement, as amended to date, between the City of San Antonio, Texas acting by and through the SAWS Board of Trustees and Vista Ridge LLC.
- E) "Vista Ridge Water" means water delivered to SAWS by or on behalf of Vista Ridge LLC pursuant to the WTPA since April 15, 2020.
- F) "CWIP" means SAWS Central Water Integration Project.

We seek the following information:

1. Documents, including reports, memoranda, billing statements, invoices, notes, emails and other communications, which establish and/or substantiate how much Vista Ridge Water has been delivered to SAWS .

2. Documents, including reports, memoranda, billing statements, invoices, notes, emails and other communications which establish or substantiate how much SAWS has paid, been billed or incurred under the WTPA or otherwise for Vista Ridge Water, including without limitation, specifics as to formula(s) used to calculate such amount, amount(s) subject to any such formula(s), and price per acre-foot applied to such amount(s).
3. Documents including reports, memoranda, billing statements, invoices, notes, emails and other communications which establish or substantiate to date, the use(s) or application(s) of Vista Ridge Water , and the amount of each such use or application, including without limitation (a) the amounts used by SAWS in hydrostatic testing (as defined in TPDES General Permit No. TXG670000 effective on April 5, 2020 ["TXG670000"]) of the CWIP; (b) otherwise used for any type of "testing" or "flushing" of the CWIP; and the amount of Vista Ridge Water delivered to SAWS customers.
4. Documents, including reports, memoranda, billing statements, invoices, notes, emails and other communications related to or which demonstrate what was done with any remaining balance of Vista Ridge Water not delivered to SAWS customers, including where and for what purpose it was stored, discharged or otherwise applied.
 5. Documents, including reports, memoranda, billing statements, invoices, notes, emails and other communications related to any use by SAWS, or proposed use, of Vista Ridge Water and/or that was reported to TCEQ, under (a) TXG670000, including without limitation Discharge Monitoring Reports and Hydrostatic Testing Reports, filed with TCEQ by SAWS with respect to Vista Ridge Water pursuant to TXG670000, or (b) any other permit, order or rule of TCEQ other than TXG670000.
 6. Documents, including reports, memoranda, billing statements, invoices, notes, emails and other communications in the possession of SAWS related to any use, or proposed use, of water related to the Vista Ridge project or filed with TCEQ by Vista Ridge since December 1, 2020, whether or not such water constituted Vista Ridge Water.
 7. Documents, including reports, memoranda, billing statements, invoices, notes, emails and other communications, in which SAWS states, or upon which SAWS relies to establish, that each disposition of remaining Vista Ridge Water in Question 4. constitutes "use for a beneficial purpose" of groundwater as described or defined in Section 36.001(9) and does not constitute "waste" of groundwater as described or defined in Section 36.001(8) of the Texas Water Code.

Thank you.

Sincerely,

Reinette King
personal mobile: 210-241-2683

cc: Donovan Burton, VP Water Resources & Governmental Relations
Nancy Belinsky, VP Legal & General Counsel, SAWS