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DOCKET NO. 43146
SOAH DOCKET NO. 473-16-2033.WS

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COMPLAINT OF CAROL D.
GILLESPIE AGAINST AVALON
WATER SUPPLY AND SEWER
SERVICES CORPORATION
(37985-1)

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BEFORE THE
PUBLIC UTILITY COMMISSION
OF TEXAS

RESPONDENT AVALON'S RESPONSE TO
COMPLAINANT GILLESPIE'S
FIRST REQUEST FOR INFORMATION

TO: Carol D. Gillespie, by and through her counsel of record, Helen Gilbert, Gilbert Wilburn, PLLC, 7000 N. MoPac Expwy, Suite 200, Austin, Texas 78731.

Respondent Avalon Water Supply and Sewer Services Corporation (Avalon) files this its Response to Complainant Gillespie's First Request for Information.

Avalon's written responses to Complainant Gillespie's First Request for Information are attached and incorporated by reference. Each response is stated on or attached to a separate page on which the request has been restated. Avalon's responses are made in the spirit of cooperation without waiving Avalon's right to contest the admissibility of any of these matters at hearing. Pursuant to P.U.C. PROC. R 22.144(c)(2)(A). Each response lists the preparer or person under whose direct supervision the response was prepared and any sponsoring witness. When Avalon provides certain information sought by the request while objecting to the provision of information, they do so without prejudice to their objection and in the interests of narrowing discovery disputes pursuant to P.U.C. PROC. R 22.144(d)(5). Pursuant to P.U.C. PROC. R 22.144(c)(2)(F), Avalon stipulates that their responses may be treated by all parties as if they were made under oath.

Respectfully submitted,
MARY K. SAHS, P.C.

609 Thrasher Lane
Austin, TX 78741
Telephone: 512-326-2556
Facsimile: 512-597-2516
marysahs@sahslaw.com

By:


Mary K. Sahs

State Bar No. 17522300

ATTORNEY FOR RESPONDENT,
AVALON WATER SUPPLY AND
SEWER SERVICE
CORPORATION

CERTIFICATE OF SERVICE

I certify that, on April 18, 2016, I have served a copy of this filing upon all known parties of record via email with read receipt requested per SOAH Order No. 2.


Mary K. Sahs

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REQUESTS FOR DISCLOSURES UNDER RULE 194.2

(a) the correct names of the parties to the lawsuit;

RESPONSE: Avalon Water Supply and Sewer Service Corporation

(b) the name, address, and telephone number of any potential parties;

RESPONSE: None other than Complainant, Respondent, and PUC Staff

(c) the legal theories and, in general, the factual bases of the responding party's claims or defenses.

RESPONSE: Complainant's complaints are being addressed by the PUC under Texas Water Code section 13.004. Rural areas of the state are often served by a "water supply or sewer service corporation" (WSC). A WSC is a nonprofit, member-owned and member--controlled corporation organized and operating under Texas Water Code chapter 67 that provides potable water service or sewer service for compensation. Respondent is a WSC.

Many of the PUC's rules under 16 Texas Administrative Code chapter 24, subchapter E, governing customer service requirements do not apply to WSCs. This level of supervision in part reflects that WSCs operate on a nonprofit basis. More fundamentally, however, it reflects that WSCs must be governed by boards of directors elected by member customers. Finally, it reflects

that rural water companies like Avalon are usually quite small, with a small number of members and limited resources, and are managed by a volunteer board of directors.

The only jurisdiction the PUC has over Complainant's complaints is in the two narrowly defined instances set out in Texas Water Code section 13.004. Under Texas Water Code section 13.004, the agency may obtain original jurisdiction in two instances and only two instances: (1) if it finds that the WSC is failing to conduct annual or special meetings in compliance with Texas Water Code Section 67.007; or (2) if the agency finds that a WSC is operating in a manner that does not comply with the requirements for classification as a WSC prescribed by Texas Water Code Sections 13.002(11) and (24). Only if the PUC makes one of these two specific findings about Avalon, and thus obtains original jurisdiction over Avalon, do the PUC regulations pertaining to a "water and sewer utility" apply. Water and sewer utilities, also referred to simply as "utilities," are the most highly regulated category of retail water service providers. Avalon does not fall into this category.

The PUC's original jurisdiction over a WSC ends if the PUC's order under 13.004 expires, or the WSC demonstrates that for the past 24 consecutive months it has conducted annual meetings as required and has operated in a manner that complies with the membership and nonprofit organization requirements for WSCs.

Avalon has fully complied with the requirements of Texas Water Code 67.007 and the provisions incorporated by reference in that section. Those who either receive or will be eligible to receive water or sewer utility service from Avalon are members. Avalon is controlled by its members, with each member entitled to only one vote regardless of the number of memberships the person owns.

Avalon is a nonprofit corporation organized and operating under Texas Water Code chapter 67. It provides potable water service and sewer service for compensation. It has adopted and is operating according to its by-laws and articles of incorporation. These ensure that Avalon is member-owned and member-controlled. Avalon does not provide water or sewer service to individuals who are not members. Avalon conducts annual and special meetings in compliance with Texas Water Code section 67.007. For at least the past 24 months, Avalon has conducted annual meetings as required and has operated in a manner that complies with the membership and nonprofit organization requirements for WSCs.

Complainant's many complaints are primarily based upon issues outside an inquiry under Texas Water Code 13.004 and are based on events that occurred not only more than 24 months ago, but events going back six years and events that occurred during the term of a prior board of directors. For example, complaints about Avalon's tariff and rules and regulations relating to or affecting the rates, utility service, product, or commodity furnished are not properly considered under section 13.004. While Avalon must file its tariff with the PUC, the filing, according to statute and regulation, "is for information purposes only." As another example, complaints about whether Avalon complies with the Open Meetings Act are outside the scope of this case. Although the Open Meetings Act applies to WSCs, alleged non-compliance with the Act can only be addressed as provided in the Act, which requires litigation in state courts. No state agency, not even the Office of the Attorney General of Texas, has the authority to make factual determinations about whether a WSC is complying with the requirements of the Open Meetings Act.

In the event that the PUC finds that Avalon is failing to comply with Texas Water Code section 13.004, the only remedy allowed by Texas law is to obtain original jurisdiction over Avalon and apply PUC regulations pertaining to a "water and sewer utility" to Avalon until such time as

Avalon can again demonstrate that for 24 consecutive months it has conducted annual meetings as required and has operated in a manner that complies with the membership and nonprofit organization requirements for WSCs.

- (e) the name, address, and telephone number of persons having knowledge of relevant facts, and a brief statement of each identified person's connection with the case;

Ms. Mary Bates

Ms. Carol Gillespie

Ms. Marcia Gillespie

POSITION	NAME	2011	PHONE NUMBER	ADDRESS
President	Patsy Russell	Jan/Dec	(972) 627-3284	PO BOX B, Avalon Texas 76623
Vice President	John Goodwyn	Jan/Dec	(214)872-0028	380 Solon Rd APT 424, Waxahachie Texas 75165
Secretary/Treasure	Robin Donaldson	Jan/Dec	(972) 351-7394	355 FM 55, Waxahachie Texas ,75165
Director	Denice Wimbish	Jan/Dec	(972) 627-3266	PO BOX 460, Avalon Texas 76623
Director	Santos Munguia	Jan/Dec	(469) 744-6447	PO BOX 248, Italy Texas 76651
Director	Harrison Romero	Jan/Dec	(972)-627-0215	PO BOX 485, Avalon Texas 76623
Director	Terry Shears	Jan/Sep.	(214)402-2759	5005 FM 55, Waxahachie Texas 75165
Director	Manuel Rodriguez	Nov/Dec	(972)617-5528	PO Box 88, Avalon Texas 76623
EMPLOYEE	POSITION		PHONE NUMBER	ADDRESS
Gregg Rodriquez	Operator		(214) 669-1865	118 S FM 55, Italy Texas 76651
HillCo Kent Smith	Operator		(254)687-2331	115 E Main, Itasca Texas 76055
POSITION	NAME	2012	PHONE NUMBER	ADDRESS
President	Patsy Russell	Jan/Apr	(972) 627-3284	PO BOX B, Avalon Texas 76623

President	David Waishes	May/Dec	(972) 921-7113	1957 FM 55, Blooming Grove Texas 76626
Vice President	John Goodwyn	Jan/Mar	(214)872-0028	380 Solon Rd APT 424, Waxahachie Texas 75165
Vice President	David Waishes	Apr	(972) 921-7113	1957 FM 55, Blooming Grove Texas 76626
Vice President	Patsy Russell	May	(972) 627-3284	PO BOX B, Avalon Texas 76623
Vice President	Jimmy Brown	May/Dec	(469)951-9970	PO BOX 36, Avalon Texas 76623
Secretary/Treasure	Robin Donaldson	Jan/Dec	(972) 351-7394	355 FM 55, Waxahachie Texas 75165
Director	Denice Wimbish	Jan/Dec	(972) 627-3266	PO BOX 460, Avalon Texas 76623
Director	Santos Munguia	Jan/Apr	(469) 744-6447	PO BOX 248, Italy Texas 76651
Director	Jeremy Langley	May/Dec	(972)935-3456	PO BOX 91 Avalon, Texas 76623
Director	Harrison Romero	Jan/Dec	(972)-627-0215	PO BOX 485, Avalon Texas 76623
Director	Manual Rodriguez	Jan/Dec	(972)617-5528	PO Box 88, Avalon Texas 76623
EMPLOYEE	POSITION		PHONE NUMBER	ADDRESS
Gregg Rodriquez	Operator		(214) 669-1865	118 S FM 55, Italy Texas 76651
Wendy Frank	Office Manager		(972) 493-1764	103 W Crossmain, Milford Texas 76670
Dean Carroll	General Manager		Unknown	Unknown
POSITION	NAME	2013	PHONE NUMBER	ADDRESS
President	David Waishes	Jan/Dec	(972) 921-7113	1957 FM 55, Blooming Grove Texas 76626
Vice President	Jimmy Brown	Jan/Dec	(469)951-9970	PO BOX 36, Avalon Texas 76623
Secretary/Treasure	Robin Donaldson	Jan/Dec	(972) 351-7394	355 FM 55, Waxahachie Texas ,75165
Director	Denice Wimbish	Jan/Dec	(972) 627-3266	PO BOX 460, Avalon Texas 76623
Director	Harrison Romero	Jan/Feb	(972)-627-0215	PO BOX 485, Avalon Texas 76623
Director	Ricky Johnson	Apr/Dec	(972) 937-6980	1336 FEASTER RD, Waxahachie Texas 75165
Director	Manuel Rodriguez	Jan/Dec	(972)617-5528	PO Box 88, Avalon Texas 76623
Director	Jeremy Langley	Jan/Dec	(972)935-3456	PO BOX 91 Avalon, Texas 76623
EMPLOYEE	POSITION		PHONE NUMBER	ADDRESS

Gregg Rodriquez	Operator		(214) 669-1865	118 S FM 55, Italy Texas 76651
Joe Valdez	Helper		(972)351-7695	PO BOX 468, Venus Texas 76084
James Martinez	Helper		(972)921-2934	7411 W HWY 34, Ennis Texas 75119
Daniel Waishes	Helper		(972)837-0657	1957 fm 55 Blooming Grove, Texas 76626
Justin Daniel	Helper		(214)949-2350	3115 Sanger Creek Way, Waxahchie Texas
POSITION	NAME	2014	PHONE NUMBER	ADDRESS
President	David Waishes	Jan/ Dec	(972) 921-7113	1957 FM 55, Blooming Grove Texas 76626
Vice President	Jimmy Brown	Jan/ Apr	(469)951-9970	PO BOX 36, Avalon Texas 76623
Vice President	Jacob Carter	May/Dec	(214) 770-4489	710 JACK EASTHAM RD, Italy Texas 76651
Secretary/Treasure	Robin Donaldson	Jan/ Dec	(972) 351-7394	355 FM 55, Waxahachie Texas 75165
Director	Denice Wimbish	Jan/ Dec	(972) 627-3266	PO BOX 460, Avalon Texas 76623
Director	Ricky Johnson	Jan/ Nov	(972) 937-6980	1336 FEASTER RD, Waxahachie Texas 75165
Director	Jimmy Brown	Nov/Dec	(469)951-9970	PO BOX 36, Avalon Texas 76623
Director	Manuel Rodriguez	Jan/ Nov	(972)617-5528	PO Box 88, Avalon Texas 76623
Director	Matilda Williams	Nov/Dec	(214) 543-9596	5860 FM 1181, Ennis Texas 75119
Director	Jeremy Langley	Jan/ Apr	(972)935-3456	PO BOX 91 Avalon, Texas 76623
Director	Gary Low	May/Dec	(903) 879-0468	422 JACK EASTHAM RD, Italy Tx 76651
EMPLOYEE	POSITION		PHONE NUMBER	ADDRESS
Heather Howell	Office Manager		(469)297-0237	240 Southwinds Rd, Italy Texas 76651
Joe Valdez	Helper		(972)351-7695	PO BOX 468, Venus Texas 76084
Gregg Rodriguez	Operator		(214) 669-1865	118 S FM 55, Italy Texas 76651
Gary Low	General Manager		(903) 879-0468	422 JACK EASTHAM RD, Italy Tx 76651
Jan Hettinger	Office Manager		(972) 627-3470	PO BOX 200, Bardwell Texas 75101
Ed Hettinger	General Manager		(972) 627-3470	PO BOX 200, Bardwell Texas 75101
Brian Roberts	Helper		(972)-627-0215	300 East Patton, Aquilla Texas 76622

Jacob Waishes	Helper		(972)921-7327	1957 FM 55 Blooming Grove, Texas 76626
Scott Baker	Helper		(817)845-0524	117 West County Road 109, Venus Texas 76084
Elton Crocker	Helper		(214)399-6430	4409 E FM 55 Avalon, Texas 76623
Jo Beth Martin	General Manager		(972) 627-3210	PO BOX 515, Avalon Texas 76623
POSITION	NAME	2015	PHONE NUMBER	ADDRESS
President	David Waishes	Jan/ Dec	(972) 921-7113	1957 FM 55, Blooming Grove Texas 76626
Vice President	Jacob Carter	Jan/Dec	(214) 770-4489	710 JACK EASTHAM RD, Italy Texas 76651
Secretary/Treasure	Robin Donaldson	Jan/Dec	(972) 351-7394	355 FM 55, Waxahachie Texas ,75165
Director	Gary Low	Jan/May	972-627-3009	422 JACK EASTHAM RD, Italy Tx 76651
Director	Candice Brewster	Sep/Dec	(469) 285-6066	116 OLD BLOOMING GROVE RD, Italy 76651
Director	Denice Wimbish	Jan/ Dec	(972) 627-3266	PO BOX 460, Avalon Texas 76623
Director	Jimmy Brown	Jan/Dec	(469)951-9970	PO BOX 36, Avalon Texas 76623
Director	Matilda Williams	Jan/Dec	(214) 543-9596	5860 FM 1181, Ennis Texas 75119
EMPLOYEE	POSITION		PHONE NUMBER	ADDRESS
Heather Howell	Office Manager		(469)297-0237	240 Southwinds Rd, Italy Texas 76651
Jo Beth Martin	General Manager		(972) 627-3210	PO BOX 515, Avalon Texas 76623
Joe Valdez	Helper		(972)351-7695	PO BOX 468, Venus Texas 76084
Calvin Phillips	General Manager		(972)351-7784	345 FEASTER RD, Ennis Texas 75119
Kyle Hollingsworth	Helper		(214)949-6146	104 West Main, Bardwell Texas 75101
Cesar Roca	Operator		(469)853-3026	PO BOX 204, Venus Texas 76084
Brandon Roath	Helper		(214)875-3397	500 S ward Street Italy, Texas 76651
POSITION	NAME	2016	PHONE NUMBER	ADDRESS
President	Kay Leamon	Current	(214)801-0498	
President	David Waishes	Jan/April	(972) 921-7113	1957 FM 55, Blooming Grove Texas 76626
Vice President	Jacob Carter	Jan/ Pres	(214) 770-4489	710 JACK EASTHAM RD, Italy Texas 76651

Secretary/Treasure	Robin Donaldson	Jan/Pres	(972) 351-7394	355 FM 55, Waxahachie Texas 75165
Director	Candice Brewster	Jan/ Pres	(469) 285-6066	116 OLD BLOOMING GROVE RD, Italy 76651
Director	Denice Wimbish	Jan/Pres	(972) 627-3266	PO BOX 460, Avalon Texas 76623
Director	Jimmy Brown	Jan/Pres	(469)951-9970	PO BOX 36, Avalon Texas 76623
Director	Matilda Williams	Jan/Pres	(214) 543-9596	5860 FM 1181, Ennis Texas 75119
EMPLOYEE	POSITION		PHONE NUMBER	ADDRESS
Heather Howell	Office Manager		(469)297-0237	240 Southwinds Rd, Italy Texas 76651
Calvin Phillips	General Manager		(972)351-7784	345 FEASTER RD, Ennis Texas 75119
Joe Valdez	Helper		(972)351-7695	PO BOX 468, Venus Texas 76084
Cesar Roca	Operator		(469)853-3026	PO BOX 204, Venus Texas 76084
Nick Marion	Helper		(469)285-3697	3532 FM 55 ,Waxahachie Texas 75165
Kyle Hollingsworth	Helper		(214)949-6146	104 West Main, Bardwell Texas 75101

RESPONSE:

(f) for any testifying expert:

(1) the expert's name, address, and telephone number;

RESPONSE: None at this time.

(2) the subject matter on which the expert will testify;

RESPONSE: N/A

(3) the general substance of the expert's mental impressions and opinions and a brief summary of the basis for them, or if the expert is not retained by,

employed by, or otherwise subject to the control of the responding party,
documents reflecting such information;

RESPONSE: N/A

(4) if the expert is retained by, employed by, or otherwise subject to the
control of the responding party:

(A) all documents, tangible things, reports, models, or data
compilations that have been provided to, reviewed by, or prepared
by or for the expert in anticipation of the expert's testimony; and

RESPONSE: N/A

B) the expert's current resume and bibliography;

RESPONSE: N/A

(h) any settlement agreements described in TRCP 192.3(g);

RESPONSE: N/A

(i) any witness statements described in TRCP 192.3(h).

RESPONSE: None

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SOAH DOCKET NO. 473-16-2033.WS**

COMPLAINT OF CAROL D. GILLESPIE AGAINST AVALON WATER SUPPLY AND SEWER SERVICES CORPORATION (37985-1)	§ § § § §	BEFORE THE PUBLIC UTILITY COMMISSION OF TEXAS
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REQUESTS FOR PRODUCTION

Request for Production 1-1. Please provide the ballot applications filed with the corporation for the elections that the corporation conducted in the years 2011, 2012, 2013, 2014, 2015, and 2016, including all director positions.

RESPONSE:

See Avalon 000617-000630.

PREPARATION AND SPONSOR OF RESPONSE:

David Waishes, Avalon Director and President of the Board of Directors from 2012 to April 2016, participated in preparing the response to this RFP. David Waishes is the witness, if any, who will sponsor the answer to this RFP. Calvin Phillips also participated in preparing the response to this RFP.

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Request for Production 1-2. Please provide the corporation's notification to the members of the corporation of the ballot application deadline for the elections that the corporation conducted in the years 2011, 2012, 2013, 2014, 2015, and 2016.

RESPONSE:

See Avalon 000631-000634.

PREPARATION AND SPONSOR OF RESPONSE:

David Waishes, Avalon Director and President of the Board of Directors from 2012 to April 2016, participated in preparing the response to this RFP. David Waishes is the witness, if any, who will sponsor the answer to this RFP. Calvin Phillips also participated in preparing the response to this RFP.

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Request for Production 1-3. Please provide the notice of the corporation's annual meetings for years 2011, 2012, 2013, 2014, 2015, and 2016.

RESPONSE:

See Avalon 000635-000638.

PREPARATION AND SPONSOR OF RESPONSE:

David Waishes, Avalon Director and President of the Board of Directors from 2012 to April 2016, participated in preparing the response to this RFP. David Waishes is the witness, if any, who will sponsor the answer to this RFP. Calvin Phillips also participated in preparing the response to this RFP.

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Request for Production 1-4. Please provide the election ballot for the corporation's election that the corporation conducted in the years 2011, 2012, 2013, 2014, 2015, and 2016.

RESPONSE:

See Avalon 000639-000642.

PREPARATION AND SPONSOR OF RESPONSE:

David Waishes, Avalon Director and President of the Board of Directors from 2012 to April 2016, participated in preparing the response to this RFP. David Waishes is the witness, if any, who will sponsor the answer to this RFP. Calvin Phillips also participated in preparing the response to this RFP.

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Request for Production 1-5. Please provide the statement of each candidate's qualifications, including biological information, for the corporation's elections that the corporation conducted in the years 2011, 2012, 2013, 2014, 2015, and 2016.

RESPONSE:

See Avalon 000643-000655.

PREPARATION AND SPONSOR OF RESPONSE:

David Waishes, Avalon Director and President of the Board of Directors from 2012 to April 2016, participated in preparing the response to this RFP. David Waishes is the witness, if any, who will sponsor the answer to this RFP. Calvin Phillips also participated in preparing the response to this RFP.

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Request for Production 1-6. Please provide the board of the corporation's order or resolution calling the corporation's annual meeting for the years 2011, 2012, 2013, 2014, 2015, and 2016.

RESPONSE:

Avalon has not identified documents responsive to this request. If Avalon identifies any such documents it will supplement its response to this request.

PREPARATION AND SPONSOR OF RESPONSE:

David Waishes, Avalon Director and President of the Board of Directors from 2012 to April 2016, participated in preparing the response to this RFP. David Waishes is the witness, if any, who will sponsor the answer to this RFP. Calvin Phillips also participated in preparing the response to this RFP.

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Request for Production 1-7. Please provide the board of the corporation's order or resolution calling the corporation's director elections that the corporation conducted in the years 2011, 2012, 2013, 2014, 2015, and 2016.

RESPONSE:

Avalon has not identified documents responsive to this request. If Avalon identifies any such documents it will supplement its response to this request.

PREPARATION AND SPONSOR OF RESPONSE:

David Waishes, Avalon Director and President of the Board of Directors from 2012 to April 2016, participated in preparing the response to this RFP. David Waishes is the witness, if any, who will sponsor the answer to this RFP. Calvin Phillips also participated in preparing the response to this RFP.

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Request for Production 1-8. Please provide all ballots received for the corporation's director elections for the elections that the corporation conducted in the years 2011, 2012, 2013, 2014, 2015, and 2016.

RESPONSE:

See Avalon 000656-000728.

PREPARATION AND SPONSOR OF RESPONSE:

David Waishes, Avalon Director and President of the Board of Directors from 2012 to April 2016, participated in preparing the response to this RFP. David Waishes is the witness, if any, who will sponsor the answer to this RFP. Calvin Phillips also participated in preparing the response to this RFP.

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COMPLAINT OF CAROL D.	§	BEFORE THE
GILLESPIE AGAINST AVALON	§	
WATER SUPPLY AND SEWER	§	PUBLIC UTILITY COMMISSION
SERVICES CORPORATION	§	
(37985-1)	§	OF TEXAS

Request for Production 1-9. Please provide the independent election auditor's written report of the election results for the elections that the corporation conducted in the years 2011, 2012, 2013, 2014, 2015, and 2016.

RESPONSE:

See Avalon 000729-000731.

PREPARATION AND SPONSOR OF RESPONSE:

David Waishes, Avalon Director and President of the Board of Directors from 2012 to April 2016, participated in preparing the response to this RFP. David Waishes is the witness, if any, who will sponsor the answer to this RFP. Calvin Phillips also participated in preparing the response to this RFP.

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Request for Production 1-10. Please provide the written procedures that the corporation's board adopted for conducting the corporation's annual meeting in the years 2011, 2012, 2013, 2014, 2015, and 2016.

RESPONSE:

See Avalon 000732-000761.

PREPARATION AND SPONSOR OF RESPONSE:

David Waishes, Avalon Director and President of the Board of Directors from 2012 to April 2016, participated in preparing the response to this RFP. David Waishes is the witness, if any, who will sponsor the answer to this RFP. Calvin Phillips also participated in preparing the response to this RFP.

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Request for Production 1-11. Please provide the board of the corporation's order or resolution approving the ballot form used for the corporation's annual or special meetings in the years 2011, 2012, 2013, 2014, 2015, and 2016.

RESPONSE:

Avalon has not identified documents responsive to this request. If Avalon identifies any such documents it will supplement its response to this request.

PREPARATION AND SPONSOR OF RESPONSE:

David Waishes, Avalon Director and President of the Board of Directors from 2012 to April 2016, participated in preparing the response to this RFP. David Waishes is the witness, if any, who will sponsor the answer to this RFP. Calvin Phillips also participated in preparing the response to this RFP.

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COMPLAINT OF CAROL D. GILLESPIE AGAINST AVALON WATER SUPPLY AND SEWER SERVICES CORPORATION (37985-1)	§ § § § §	BEFORE THE PUBLIC UTILITY COMMISSION OF TEXAS
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Request for Production 1-12. Please provide the board of the corporation's order or resolution selecting the independent election auditor for the corporation's elections conducted in the years 2011, 2012, 2013, 2014, 2015, and 2016.

RESPONSE:

Avalon has not identified documents responsive to this request. If Avalon identifies any such documents it will supplement its response to this request.

PREPARATION AND SPONSOR OF RESPONSE:

David Waishes, Avalon Director and President of the Board of Directors from 2012 to April 2016, participated in preparing the response to this RFP. David Waishes is the witness, if any, who will sponsor the answer to this RFP. Calvin Phillips also participated in preparing the response to this RFP.

**DOCKET NO. 43146
SOAH DOCKET NO. 473-16-2033.WS**

COMPLAINT OF CAROL D. GILLESPIE AGAINST AVALON WATER SUPPLY AND SEWER SERVICES CORPORATION (37985-1)	§ § § § §	BEFORE THE PUBLIC UTILITY COMMISSION OF TEXAS
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Request for Production 1-13. Please provide the board of the corporation's order or resolution adopting the corporation's budget for the fiscal years 2011, 2012, 2013, 2014, 2015, and 2016.

RESPONSE:

Avalon has not identified documents responsive to this request. If Avalon identifies any such documents it will supplement its response to this request.

PREPARATION AND SPONSOR OF RESPONSE:

David Waishes, Avalon Director and President of the Board of Directors from 2012 to April 2016, participated in preparing the response to this RFP. David Waishes is the witness, if any, who will sponsor the answer to this RFP. Calvin Phillips also participated in preparing the response to this RFP.

**DOCKET NO. 43146
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COMPLAINT OF CAROL D. GILLESPIE AGAINST AVALON WATER SUPPLY AND SEWER SERVICES CORPORATION (37985-1)	§ § § § §	BEFORE THE PUBLIC UTILITY COMMISSION OF TEXAS
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Request for Production 1-14. Please provide the board of the corporation's bank statements for the fiscal years 2011, 2012, 2013, 2014, 2015, and 2016.

RESPONSE:

See Avalon 002406-003065.

PREPARATION AND SPONSOR OF RESPONSE:

David Waishes, Avalon Director and President of the Board of Directors from 2012 to April 2016, participated in preparing the response to this RFP. David Waishes is the witness, if any, who will sponsor the answer to this RFP. Calvin Phillips also participated in preparing the response to this RFP.

**DOCKET NO. 43146
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COMPLAINT OF CAROL D. GILLESPIE AGAINST AVALON WATER SUPPLY AND SEWER SERVICES CORPORATION (37985-1)	§ § § § §	BEFORE THE PUBLIC UTILITY COMMISSION OF TEXAS
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Request for Production 1-15. Please provide the corporation's budget for the fiscal years 2011, 2012, 2013, 2014, 2015, and 2016.

RESPONSE:

See Avalon 000762-000764.

PREPARATION AND SPONSOR OF RESPONSE:

David Waishes, Avalon Director and President of the Board of Directors from 2012 to April 2016, participated in preparing the response to this RFP. David Waishes is the witness, if any, who will sponsor the answer to this RFP. Calvin Phillips also participated in preparing the response to this RFP.

**DOCKET NO. 43146
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COMPLAINT OF CAROL D. GILLESPIE AGAINST AVALON WATER SUPPLY AND SEWER SERVICES CORPORATION (37985-1)	§ § § § §	BEFORE THE PUBLIC UTILITY COMMISSION OF TEXAS
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Request for Production 1-16. Please provide each director candidate's signed statement of the person's qualifications, including a statement that the person has the qualifications prescribed by Texas Water Code Section 67.0051, for the corporation's elections conducted in the years 2011, 2012, 2013, 2014, 2015, and 2016.

RESPONSE:

See Avalon 000765-000792.

PREPARATION AND SPONSOR OF RESPONSE:

David Waishes, Avalon Director and President of the Board of Directors from 2012 to April 2016, participated in preparing the response to this RFP. David Waishes is the witness, if any, who will sponsor the answer to this RFP. Calvin Phillips also participated in preparing the response to this RFP.

**DOCKET NO. 43146
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COMPLAINT OF CAROL D. GILLESPIE AGAINST AVALON WATER SUPPLY AND SEWER SERVICES CORPORATION (37985-1)	§ § § § §	BEFORE THE PUBLIC UTILITY COMMISSION OF TEXAS
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Request for Production 1-17. Please provide each director candidate's written consent to serve for the corporation's director elections conducted in the years 2011, 2012, 2013, 2014, 2015, and 2016.

RESPONSE:

See Avalon 000793-000806.

PREPARATION AND SPONSOR OF RESPONSE:

David Waishes, Avalon Director and President of the Board of Directors from 2012 to April 2016, participated in preparing the response to this RFP. David Waishes is the witness, if any, who will sponsor the answer to this RFP. Calvin Phillips also participated in preparing the response to this RFP.

**DOCKET NO. 43146
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COMPLAINT OF CAROL D. GILLESPIE AGAINST AVALON WATER SUPPLY AND SEWER SERVICES CORPORATION (37985-1)	§ § § § §	BEFORE THE PUBLIC UTILITY COMMISSION OF TEXAS
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Request for Production 1-18. Please provide any notice of defects in the candidate applications for the corporation's director elections conducted in the years 2011, 2012, 2013, 2014, 2015, and 2016.

RESPONSE:

Avalon has not identified documents responsive to this request. If Avalon identifies any such documents it will supplement its response to this request.

PREPARATION AND SPONSOR OF RESPONSE:

David Waishes, Avalon Director and President of the Board of Directors from 2012 to April 2016, participated in preparing the response to this RFP. David Waishes is the witness, if any, who will sponsor the answer to this RFP. Calvin Phillips also participated in preparing the response to this RFP.

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COMPLAINT OF CAROL D. GILLESPIE AGAINST AVALON WATER SUPPLY AND SEWER SERVICES CORPORATION (37985-1)	§ § § § §	BEFORE THE PUBLIC UTILITY COMMISSION OF TEXAS
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Request for Production 1-19. Please provide the drafts of the ballot that the credentials committee presented to the corporation's board for the elections conducted in the years 2011, 2012, 2013, 2014, 2015, and 2016.

RESPONSE:

Avalon has not identified documents responsive to this request. If Avalon identifies any such documents it will supplement its response to this request.

PREPARATION AND SPONSOR OF RESPONSE:

David Waishes, Avalon Director and President of the Board of Directors from 2012 to April 2016, participated in preparing the response to this RFP. David Waishes is the witness, if any, who will sponsor the answer to this RFP. Calvin Phillips also participated in preparing the response to this RFP.

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COMPLAINT OF CAROL D. GILLESPIE AGAINST AVALON WATER SUPPLY AND SEWER SERVICES CORPORATION (37985-1)	§ § § § §	BEFORE THE PUBLIC UTILITY COMMISSION OF TEXAS
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Request for Production 1-20. Please provide the drafts of the annual meeting agenda that the credentials committee presented to the corporation's board for the elections conducted in the years 2011, 2012, 2013, 2014, 2015, and 2016.

RESPONSE:

Avalon has not identified documents responsive to this request. If Avalon identifies any such documents it will supplement its response to this request.

PREPARATION AND SPONSOR OF RESPONSE:

David Waishes, Avalon Director and President of the Board of Directors from 2012 to April 2016, participated in preparing the response to this RFP. David Waishes is the witness, if any, who will sponsor the answer to this RFP. Calvin Phillips also participated in preparing the response to this RFP.

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COMPLAINT OF CAROL D. GILLESPIE AGAINST AVALON WATER SUPPLY AND SEWER SERVICES CORPORATION (37985-1)	§ § § § §	BEFORE THE PUBLIC UTILITY COMMISSION OF TEXAS
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Request for Production 1-21. Please provide the drafts of the meeting packets for the annual meeting the credentials committee presented to the corporation's board for the elections conducted in the years 2011, 2012, 2013, 2014, 2015, and 2016.

RESPONSE:

Avalon has not identified documents responsive to this request. If Avalon identifies any such documents it will supplement its response to this request.

PREPARATION AND SPONSOR OF RESPONSE:

David Waishes, Avalon Director and President of the Board of Directors from 2012 to April 2016, participated in preparing the response to this RFP. David Waishes is the witness, if any, who will sponsor the answer to this RFP. Calvin Phillips also participated in preparing the response to this RFP.

**DOCKET NO. 43146
SOAH DOCKET NO. 473-16-2033.WS**

COMPLAINT OF CAROL D. GILLESPIE AGAINST AVALON WATER SUPPLY AND SEWER SERVICES CORPORATION (37985-1)	§ § § § §	BEFORE THE PUBLIC UTILITY COMMISSION OF TEXAS
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Request for Production 1-22. Please provide the voting roster for the corporation's elections conducted in the years 2011, 2012, 2013, 2014, 2015, and 2016.

RESPONSE:

See Avalon 000639-000642.

PREPARATION AND SPONSOR OF RESPONSE:

David Waishes, Avalon Director and President of the Board of Directors from 2012 to April 2016, participated in preparing the response to this RFP. David Waishes is the witness, if any, who will sponsor the answer to this RFP. Calvin Phillips also participated in preparing the response to this RFP.

**DOCKET NO. 43146
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COMPLAINT OF CAROL D. GILLESPIE AGAINST AVALON WATER SUPPLY AND SEWER SERVICES CORPORATION (37985-1)	§ § § § §	BEFORE THE PUBLIC UTILITY COMMISSION OF TEXAS
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Request for Production 1-23. Please provide the meeting packet that was mailed to each voting member for any member meeting that the corporation conducted in the years 2011, 2012, 2013, 2014, 2015, and 2016.

RESPONSE:

See Avalon 000807-0000862.

PREPARATION AND SPONSOR OF RESPONSE:

David Waishes, Avalon Director and President of the Board of Directors from 2012 to April 2016, participated in preparing the response to this RFP. David Waishes is the witness, if any, who will sponsor the answer to this RFP. Calvin Phillips also participated in preparing the response to this RFP.

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COMPLAINT OF CAROL D. GILLESPIE AGAINST AVALON WATER SUPPLY AND SEWER SERVICES CORPORATION (37985-1)	§ § § § §	BEFORE THE PUBLIC UTILITY COMMISSION OF TEXAS
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Request for Production 1-24. Please provide the certified agenda of each closed meeting or executive session of the corporation's board of directors for the years 2011, 2012, 2013, 2014, 2015, and 2016.

RESPONSE:

OBJECTION: Avalon objects on the basis that a certified agenda of a closed meeting or executive session of the corporation's board of directors is confidential under Texas Government Code section 551.104, which provides for court-ordered access to such a certified agenda only under specific circumstances set out in the statute. Gillespie failed to file a motion to compel; therefore, Avalon's Objection stands under PUC Procedural Rule 22.144(e).

DOCKET NO. 43146
SOAH DOCKET NO. 473-16-2033.WS

**COMPLAINT OF CAROL D.
GILLESPIE AGAINST AVALON
WATER SUPPLY AND SEWER
SERVICES CORPORATION
(37985-1)**

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**BEFORE THE

PUBLIC UTILITY COMMISSION

OF TEXAS**

Request for Production 1-25. Please provide the recording of each closed meeting of the corporation's board of directors for the years 2011, 2012, 2013, 2014, 2015, and 2016.

RESPONSE:

OBJECTION: Avalon objects on the basis that the recording of each closed session meeting of the corporation's board of directors is confidential under Texas Government Code section 551.104, which provides for court-ordered access to such a recording only under specific circumstances set out in the statute. Gillespie failed to file a motion to compel; therefore, Avalon's Objection stands under PUC Procedural Rule 22.144(e).

**DOCKET NO. 43146
SOAH DOCKET NO. 473-16-2033.WS**

COMPLAINT OF CAROL D. GILLESPIE AGAINST AVALON WATER SUPPLY AND SEWER SERVICES CORPORATION (37985-1)	§ § § § §	BEFORE THE PUBLIC UTILITY COMMISSION OF TEXAS
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Request for Production 1-26. Please provide a copy of the corporation's membership transfer book.

RESPONSE:

Avalon has not identified documents responsive to this request. If Avalon identifies any such documents it will supplement its response to this request.

PREPARATION AND SPONSOR OF RESPONSE:

David Waishes, Avalon Director and President of the Board of Directors from 2012 to April 2016, participated in preparing the response to this RFP. David Waishes is the witness, if any, who will sponsor the answer to this RFP. Calvin Phillips also participated in preparing the response to this RFP.

**DOCKET NO. 43146
SOAH DOCKET NO. 473-16-2033.WS**

COMPLAINT OF CAROL D.	§	BEFORE THE
GILLESPIE AGAINST AVALON	§	
WATER SUPPLY AND SEWER	§	PUBLIC UTILITY COMMISSION
SERVICES CORPORATION	§	
(37985-1)	§	OF TEXAS

Request for Production 1-27. Please provide a copy of the corporation's annual report of financial activity for the years 2011, 2012, 2013, 2014, 2015, and 2016.

RESPONSE:

See Avalon 000863-000915.

PREPARATION AND SPONSOR OF RESPONSE:

David Waishes, Avalon Director and President of the Board of Directors from 2012 to April 2016, participated in preparing the response to this RFP. David Waishes is the witness, if any, who will sponsor the answer to this RFP. Calvin Phillips also participated in preparing the response to this RFP.

**DOCKET NO. 43146
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COMPLAINT OF CAROL D.	§	BEFORE THE
GILLESPIE AGAINST AVALON	§	
WATER SUPPLY AND SEWER	§	PUBLIC UTILITY COMMISSION
SERVICES CORPORATION	§	
(37985-1)	§	OF TEXAS

Request for Production 1-28. Please provide a copy of the corporation's federal tax return for the years 2011, 2012, 2013, 2014, 2015, and 2016.

RESPONSE:

See Avalon 000916-001005.

PREPARATION AND SPONSOR OF RESPONSE:

David Waishes, Avalon Director and President of the Board of Directors from 2012 to April 2016, participated in preparing the response to this RFP. David Waishes is the witness, if any, who will sponsor the answer to this RFP. Calvin Phillips also participated in preparing the response to this RFP.

**DOCKET NO. 43146
SOAH DOCKET NO. 473-16-2033.WS**

**COMPLAINT OF CAROL D.
GILLESPIE AGAINST AVALON
WATER SUPPLY AND SEWER
SERVICES CORPORATION
(37985-1)**

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**BEFORE THE

PUBLIC UTILITY COMMISSION

OF TEXAS**

Request for Production 1-29. Please provide all electronic mail or emails of Avalon staff to Directors of the Board and from Board Directors to Avalon staff from January 1, 2011-present.

RESPONSE:

OBJECTION: To the extent that any such electronic mail or email is not in connection with the transaction of official business as defined in Texas Government Code section 552.002(a-1) Avalon objects on the basis that such documents are not relevant and are not reasonably calculated to lead to the discovery of admissible evidence in this docket. Tex. R. Civ. Proc. 192.3(a); Tex. R. Evid. 401. Gillespie failed to file a motion to compel; therefore, Avalon's Objection stands under PUC Procedural Rule 22.144(e). Without waiving the objection, Avalon is producing the following documents:

See Avalon 001006-001039; 001041-001069; 001073-001075; 001077; 001082-001124; 001128-001134; 001138-001140; 001143-001158.

PREPARATION AND SPONSOR OF RESPONSE:

David Waishes, Avalon Director and President of the Board of Directors from 2012 to April 2016, participated in preparing the response to this RFP. David Waishes is the witness, if any, who will sponsor the answer to this RFP. Calvin Phillips, Robin Donaldson, Jimmy Brown, and John Godwyn also participated in preparing the response to this RFP.

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COMPLAINT OF CAROL D.	§	BEFORE THE
GILLESPIE AGAINST AVALON	§	
WATER SUPPLY AND SEWER	§	PUBLIC UTILITY COMMISSION
SERVICES CORPORATION	§	
(37985-1)	§	OF TEXAS

Request for Production 1-30. Please provide all written, taped or videotaped minutes of member meetings, director meetings, annual, special and emergency meetings from January 1, 2011-present.

RESPONSE:

See Avalon 001158-001313. See Avalon 002203-002303. See Avalon 001314-001736.

PREPARATION AND SPONSOR OF RESPONSE:

David Waishes, Avalon Director and President of the Board of Directors from 2012 to April 2016, participated in preparing the response to this RFP. David Waishes is the witness, if any, who will sponsor the answer to this RFP. Calvin Phillips also participated in preparing the response to this RFP.

**DOCKET NO. 43146
SOAH DOCKET NO. 473-16-2033.WS**

COMPLAINT OF CAROL D.	§	BEFORE THE
GILLESPIE AGAINST AVALON	§	
WATER SUPPLY AND SEWER	§	PUBLIC UTILITY COMMISSION
SERVICES CORPORATION	§	
(37985-1)	§	OF TEXAS

Request for Production 1-31. Please provide all notices of member meetings, director meetings, annual, special and emergency meetings from January 1, 2011-present.

RESPONSE:

See Avalon 001314-001736.

PREPARATION AND SPONSOR OF RESPONSE:

David Waishes, Avalon Director and President of the Board of Directors from 2012 to April 2016, participated in preparing the response to this RFP. David Waishes is the witness, if any, who will sponsor the answer to this RFP. Calvin Phillips also participated in preparing the response to this RFP.

**DOCKET NO. 43146
SOAH DOCKET NO. 473-16-2033.WS**

**COMPLAINT OF CAROL D.
GILLESPIE AGAINST AVALON
WATER SUPPLY AND SEWER
SERVICES CORPORATION
(37985-1)**

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**BEFORE THE

PUBLIC UTILITY COMMISSION

OF TEXAS**

Request for Production 1-32. Please provide all video tape recordings of all member meetings, director meetings, annual, special and emergency meetings from January 1, 2011-present.

RESPONSE:

Avalon has not identified documents responsive to this request. If Avalon identifies any such documents it will supplement its response to this request.

PREPARATION AND SPONSOR OF RESPONSE:

David Waishes, Avalon Director and President of the Board of Directors from 2012 to April 2016, participated in preparing the response to this RFP. David Waishes is the witness, if any, who will sponsor the answer to this RFP. Calvin Phillips also participated in preparing the response to this RFP.

DOCKET NO. 43146
SOAH DOCKET NO. 473-16-2033.WS

COMPLAINT OF CAROL D.	§	BEFORE THE
GILLESPIE AGAINST AVALON	§	
WATER SUPPLY AND SEWER	§	PUBLIC UTILITY COMMISSION
SERVICES CORPORATION	§	
(37985-1)	§	OF TEXAS

Request for Production 1-33. Please provide all Board of Directors' notes from January 1, 2011-present.

RESPONSE:

OBJECTION: To the extent that any such notes were not made in connection with the transaction of official business as defined in Texas Government Code section 552.002 (a-1) Avalon objects on the basis that such documents are not relevant and are not reasonably calculated to lead to the discovery of admissible evidence in this docket. Tex. R. Civ. Proc. 192.3 (a); Tex. R. Evid. 401. Gillespie failed to file a motion to compel; therefore, Avalon's Objection stands under PUC Procedural Rule 22.144(e). Without waiving the objection, Avalon is producing the following documents:

See Avalon 001737-001849. See Avalon 002304-002405.

PREPARATION AND SPONSOR OF RESPONSE:

David Waishes, Avalon Director and President of the Board of Directors from 2012 to April 2016, participated in preparing the response to this RFP. David Waishes is the witness, if any, who will sponsor the answer to this RFP. John Goodwyn and Robin Donaldson also participated in preparing the response to this RFP.

**DOCKET NO. 43146
SOAH DOCKET NO. 473-16-2033.WS**

COMPLAINT OF CAROL D. GILLESPIE AGAINST AVALON WATER SUPPLY AND SEWER SERVICES CORPORATION (37985-1)	§ § § § §	BEFORE THE PUBLIC UTILITY COMMISSION OF TEXAS
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Request for Production 1-34. Please provide all notes by Avalon staff from January 1, 2011-present.

RESPONSE:

OBJECTION: To the extent that any such notes were not made in connection with the transaction of official business as defined in Texas Government Code section 552.002 (a-1) Avalon objects on the basis that such documents are not relevant and are not reasonably calculated to lead to the discovery of admissible evidence in this docket. Tex. R. Civ. Proc. 192.3 (a); Tex. R. Evid. 401. Gillespie failed to file a motion to compel; therefore, Avalon's Objection stands under PUC Procedural Rule 22.144(e). Without waiving the objection, Avalon is producing the following documents:

See Avalon 001850-002022; 002024-002036.

PREPARATION AND SPONSOR OF RESPONSE:

David Waishes, Avalon Director and President of the Board of Directors from 2012 to April 2016, participated in preparing the response to this RFP. David Waishes is the witness, if any, who will sponsor the answer to this RFP. Calvin Phillips also participated in preparing the response to this RFP.

**DOCKET NO. 43146
SOAH DOCKET NO. 473-16-2033.WS**

COMPLAINT OF CAROL D. GILLESPIE AGAINST AVALON WATER SUPPLY AND SEWER SERVICES CORPORATION (37985-1)	§ § § § §	BEFORE THE PUBLIC UTILITY COMMISSION OF TEXAS
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Request for Production 1-35. Please provide all electronic mail or emails between Directors of the Board from January 1, 2011 present.

RESPONSE:

OBJECTION: To the extent that any such notes were not made in connection with the transaction of official business as defined in Texas Government Code section 552.002 (a-1) Avalon objects on the basis that such documents are not relevant and are not reasonably calculated to lead to the discovery of admissible evidence in this docket. Tex. R. Civ. Proc. 192.3 (a); Tex. R. Evid. 401. Gillespie failed to file a motion to compel; therefore, Avalon's Objection stands under PUC Procedural Rule 22.144(e). Without waiving the objection, Avalon is producing the following documents:

See Avalon 002037-002055; 002057-002202. See Avalon 001006-001069;001073-001158.

PREPARATION AND SPONSOR OF RESPONSE:

David Waishes, Avalon Director and President of the Board of Directors from 2012 to April 2016, participated in preparing the response to this RFP. David Waishes is the witness, if any, who will sponsor the answer to this RFP. Robin Donaldson, Jimmy Brown, and John Goodwyn also participate in preparing the response to this RFP.

**APPLICATION FOR BOARD OF DIRECTOR'S POSITION
OF AVALON WATER & SEWER SERVICE
CORPORATION**

This form must be accompanied by a petition signed by the lesser of 20 members or five (5%) percent of the members, requesting that the applicant's name be placed on the ballot as a candidate for director. The application form must be completed and submitted to the Corporation's main office by **February 24, 2012** for the applicant's name to be placed on the ballot.

Biographical Information

Applicant's Name: HARRISON ROMERO

Mailing Address: street, city, TX ZIP

P.O. BOX 485 AVALON, TX 76623

Physical Address (if different than mailing address):

204 KIRBY STREET

Phone #: 972 627-0215

Water System Member Since: _____ year

Director Position Sought:

DIRECTOR OF CORPORATION

Qualifications (will be printed and sent to members with ballot)

SERVED 3 YEARS AS A DIRECTOR

Previous Board of Director Experience: 3 YEARS

Business/Government Experience: 16 YEARS BOARD OF TRUSTEE
AVALON ISD

Education: BACHELOR OF ARTS/SCIENCE - DALLAS BAPTIST UNIV
ASSOCIATES DRAFTING TECHNOLOGY - LAMAR UNIVERSITY

Personal Statement (will be printed and sent to members with ballot)(100 word limit):

INCUMBENT DIRECTOR. WE WOULD LOVE TO
CONTINUE SERVING AVALON COMMUNITY.

Affirmation and Pledge to Serve:

I, HARRISON ROMERO will be at least 18 years of age on the first day of the director term; am a member of the Corporation; have not been determined by a court exercising probate jurisdiction to be totally mentally incapacitated or partially mentally incapacitated without the right to vote; and have not been finally convicted of a felony.

I have reviewed the Corporation's bylaws and certificate of formation and I meet the qualifications set forth therein. If elected, I pledge to serve in a director position on the Corporation's Board of Directors; and will do my best to attend all meetings, regular or called, as designated by the board.

Under penalties of perjury, I declare that I have reviewed the information presented in this Application, including accompanying documents, and to the best of my knowledge and belief, the information is true, correct and complete.

Signature of Applicant Harrison Romero Date 9 Feb 2012

AVALON000618

AVALON WATER & SEWER SERVICE CORPORATION

The members of AVALON WSSC, whose names and signatures appear below, petition that HARRISON ROMERO be placed on the ballot as a candidate for director of the Corporation for the April 09, 2012 election.

Signatures required if the system has 400 or more members: 20 signatures
Signatures required if the system has less than 400 members: 5% of the members

NOTE: It is advisable to obtain a few additional signatures in case any of the signatures are disqualified.

Member's Name (please print)	Member's Signature
1. Santos Munquian Jr	<i>[Signature]</i>
2. MANUEL RODRIGUEZ	<i>[Signature]</i>
3. MANUEL RODRIGUEZ	<i>[Signature]</i>
4. Denise Wimbish	<i>[Signature]</i>
5. ROBIN DONALDSON	<i>[Signature]</i>
6. John Goodwyn	<i>[Signature]</i> John B. Goodwyn as agent for Ruth Goodwyn
7. Patsy Russell	<i>[Signature]</i>
8. Jesse Munquian	<i>[Signature]</i>
9. Patty Hernandez	<i>[Signature]</i>
10. James CASHION	<i>[Signature]</i>
11. P. David Del Bosque / Avalon ISD / David Wilby for Avalon ISD	<i>[Signature]</i>
12. Aurora Hernandez	<i>[Signature]</i>
13. Jesus Palacios	<i>[Signature]</i>
14. Terry Shears	<i>[Signature]</i>
15. Phillip Roath	<i>[Signature]</i>
16. Tommy Morrison	<i>[Signature]</i>
17. Manuel Hernandez	<i>[Signature]</i>
18. HARRISON ROMERO	<i>[Signature]</i>
19. Victor H. Ledesma	<i>[Signature]</i>
20. MOSIES HERNANDEZ	<i>[Signature]</i>
JANE COOPER	<i>[Signature]</i>
Chris Guin	<i>[Signature]</i>
Beck H. I.	<i>[Signature]</i>

AVALON000619