



Control Number: 45207



Item Number: 40

Addendum StartPage: 0

SOAH DOCKET NO. 473-16-1108.WS
PUC DOCKET NO. 45207

COMPLAINT OF J. HINKEN

AGAINST

BASTROP WEST WATER AND
PAUL KLAUS

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§
§

BEFORE THE STATE OFFICE
OF
ADMINISTRATIVE HEARINGS

RECEIVED
2016 SEP 30 PM 2:10
PUBLIC UTILITY COMMISSION
FILM CLERK

BASTROP WATER WEST AND PAUL KLAUS RESPONSES TO DISCOVERY

1. Has BWW received payment for the \$655 bill at issue in this complaint?

ANSWER: Witness Paul Klaus – Yes. Bastrop Water West was paid the full amount of the February 3, 2015, invoice by real estate agent Kelley Harris.

2. If the bill has been paid, please provide any documents or receipts as proof of payment.

ANSWER: Witness Paul Klaus – Responsive documents are attached.

3. Was BWW a party to the escrow agreement involved in the sale of Complainant's property to Anastacio and Laura Rena in August of 2015, as described in Exhibit 16 of BWW's Direct Testimony?

ANSWER: Witness Paul Klaus – No. However, I let Ms. Harris know I was concerned that she was paying BWW out of her own funds because I did not want her to lose any money. See attached email dated September 8, 2015.

4. Does BWW exert any further claim for the \$655? If yes, please explain in detail.

ANSWER: Witness Paul Klaus – No.

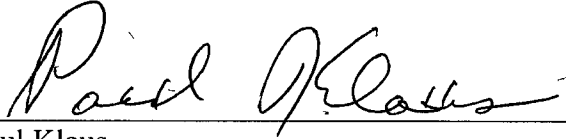
CERTIFICATE OF SERVICE

I hereby certify that a copy of BWW's discovery responses was served on all parties on September 30, 2016.


Deea Western, attorney for BWW

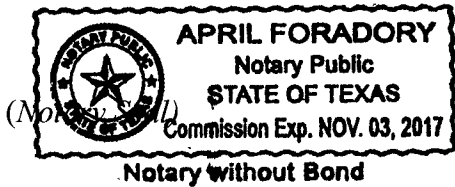
VERIFICATION

BEFORE ME, the undersigned authority, on this day personally appeared Paul Klaus, who being by me duly sworn upon his oath said he has read the foregoing responses to discovery and the statements contained therein are within his personal knowledge and are true and correct.



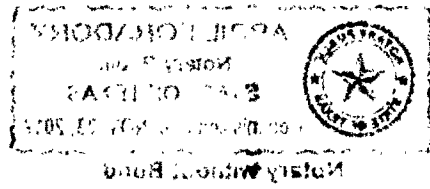
Paul Klaus

SUBSCRIBED AND SWORN TO BEFORE ME, on September 21st, 2016.





NOTARY PUBLIC
State of Texas



MITCHELL W HARRIS
KELLEY A HARRIS
PH. 512-517-8850
721 BLAIR AVE
BASTROP, TX 78602

3490

80-495/1149

9/8/2015

DATE

Form 1042-03F

PAY TO THE ORDER OF

Bastrop West Water Co. \$ 655.00
Six hundred fifty-five and 00/100 DOLLARS

FIRST NATIONAL BANK OF BASTROP

1001/2015
PO Box 111
Bastrop, TX 78602

Raymond B. Emerson
Water Replacement

Kelley Harris

Check: 3490 Amount: \$655.00 Date: 9/14/2015
Run: 89, Batch: 11, Seq: 3, Source: FNBBIMSBAS1_POD_1

1149049534 20150914
First National Bank of Bastrop
231 132

1149049534 231 132 09/14/15

<1149049534 231 132 09/14/15

Ydo 854037

Check: 3490 Amount: \$655.00 Date: 9/14/2015
Run: 89, Batch: 11, Seq: 3, Source: FNBBIMSBAS1_POD_1

Subject: Agreement

From: Karen Klaus (karenklaus@rocketmail.com)

To: kelley.harris1@gmail.com;

Date: Tuesday, September 8, 2015 1:37 PM

Kelley,

This is to memorialize our conversation this afternoon in which you will agree to pay to Bastrop West Water the debt in the amount of \$655.00 owed by Ms. Hinken in order to obtain water service. If and/or when the escrow account is released and if and/or when the debt is subsequently paid to Bastrop West Water from the escrow account, Bastrop West Water agrees to reimburse you \$655.00.

Please let me know if you need anything further.

Thank you,

Paul & Karen Klaus, Owners
Bastrop West Water Company
231 Many Lane
Red Rock, TX 78662
(512) 663-1921 - Paul
(512) 629-5717 - Karen