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P.U.C. Docket No. 45720

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PUBLIC UTILITY COMMISSION
FILING CLERK

APPLICATION OF RIO CONCHO

| BEFORE THE STATE OFFICE

AVIATION, INC FOR A

| OF

RATE/TARIFF CHANGE

| ADMINISTRATIVE HEARINGS

PREFILED TESTIMONY & EXHIBITS

OF

Roy Geer

ON BEHALF OF WATER CUSTOMERS OF

RIO CONCHO AVIATION, INC

AUGUST 17, 2016

Resume

Roy R. Geer

I am 66 years old. I graduated from Arlington High and attended TCCC for two years.

While at TCCC I received a draft notice and then enlisted in the U.S. Marine Core for two years.

Upon my release from the USMC, I went to work for Southwestern Bell.

I worked on all types of outside plant projects and supervised crews working on all types of outside plant projects during my 27 years with SWBC.

I earned my Private pilot's certificate in 1974 while employed at SWBC.

I earned my Commercial license and my Flight Instructor's rating in the years that followed.

I moved to Hicks more than 10 years ago with my wife.

I have served on the board of directors at Hicks for 6 years. From 2010-2015.

Signed

A handwritten signature in black ink, appearing to read "Rg R Geer", written over a horizontal line.

Roy R. Geer

1 Q. State your name and address

2 A. Roy R Geer, 612 Aviator Dr Fort Worth Texas 76179

3 Q. Have you ever seen any paving at Hicks Airfield associated with the Rio Concho water
4 company?

5 A. No. I was on the board of directors of Hicks Airfield Pilots Association (HAPA) for 6
6 years, from 2010 to 2015. During this time, Rio Concho did resurface the property
7 around the fuel pump area and then striped it for the helicopter landing area and
8 airplane parking area. Those areas are not part of the water facilities.

9 Q. When were you aware of a water company office at 419 Aviator?

10 A. I was aware from discussions with the other intervenors that an office was being
11 claimed by the Brunson's at that address. That was after the PUC statute violation had
12 been discussed between the intervenors and the PUC attorney and in an early
13 settlement conference discussion with the Rio Concho attorney. In late June of 2016, I
14 became aware of an installed drop box at that location.

15 Q. After learning of the airport water office, have you ever seen the water office open for
16 business, observed a schedule of hours, or ever been notified by Rio Concho of its
17 existence?

18 A. I have seen the hanger door open only one time since the dropbox was mounted on the
19 hanger. Other than the dropbox there is no indication that this is an office for the water
20 department. Unless you walk up to the dropbox you would have no idea what it is for

1 **Q. Where do you reside at Hicks Airfield?**

2 A. I live adjacent to the parking lot of the beacon restaurant (171 Aviator Dr). From my
3 vantage point I can see a large amount of any activity taking place on that property.

4 **Q. Can you see all water company property from your residence?**

5 A. No, but I have full view of the well-pump-house along with a majority view of lot 171,
6 consisting of the restaurant, fuel pump, airplane parking, helicopter landing area and
7 water system components.

8 **Q. Can you tell me how often you have seen Mrs. Brunson at Hicks Airfield in and around
9 the water facilities?**

10 A. Yes, over the past many years, I have seen Mrs. Brunson at the airfield maybe one day a
11 week on average. Although, since this water rate dispute case has evolved I have seen
12 her at the airfield much more frequently.

13 **Q. What vehicles have you seen Mrs. Brunson drive on the airfield?**

14 A. I have seen her drive two different Audi's. One is the luxury crossover she claims as the
15 water company vehicle and the other is an Audi sports car. The Audi crossover is much
16 more than the water company needs as a 'working' water company vehicle and note:
17 It's being charged to the rate paying customers!

18 **Q. Why are you a part of the water rate increase protest?**

19 A. Like many here at Hicks Airfield, I'm retired and living on a fixed income. While I
20 understand the need for a company to make a reasonable return on their investment, I

1 feel Rio Concho is taking advantage of a 'closed society' meaning a community where
2 there is no competition for water. After reviewing all the P & L statements, I feel the
3 Brunson's have had a great return on their initial investment. This rate increase, so near
4 the past increases, tells me that RIO Concho has become greedy.

5 **Q. Have you ever questioned a water bill sent to you and why?**

6 A. Yes, the bill for the month of August 2015. The bill reflected my gallons use as over
7 **56,000 gallons**. This is a very unusual amount as my normal usage is around 3000
8 gallons. After having the meter reread it was discovered a **20,000-gallon** error was
9 found. Still at corrected usage, **36,000 gallons**, was well above the usual usage. I still to
10 this day I find it hard to believe I actually consumed that amount of water in 1 month.