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PUC DOCKET NO. 46923
SOAH DOCKET NO. 473-17-5770 WS

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SEP 28 AM 9:16

APPLICATION OF WOLFE
AIRPARK CIVIC CLUB, INC. TO
OBTAIN A WATER CERTIFICATE
OF CONVENIENCE AND
NECESSITY IN BRAZORIA COUNTY

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PUBLIC UTILITY COMMISSION
FILING CLERK
OF TEXAS

**APPLICANT'S MOTION TO DISMISS JOE WALKER'S COMPLAINT AND
REQUEST TO CONSOLIDATE PROPOSED ISSUES**

RESPONSE

Pursuant to the Order of Referral Dated August 23, 2017, Wolfe Airpark Civic Club Inc. has asked for the dismissal of my complaint. Please deny the applicant's request for the following reasons.

- a. As a Registered Profession Engineer under Texas law, I am an expert in matters concerning the interpretations of Texas Civil Statutes concerning water systems. My understanding of how the water system is built, was designed, is intended to be operated, and has been operated is accurate. The claims by the Applicant concerning these matters are invalid and incorrect.
- b. I have lived at the site and used the water system for many years.
- c. I, as a lot owner, own the water system.
- d. I have substantial documentation for the verification of every one of my points.
- e. All of my points submitted in my initial response were valid.
- f. Please note that as a responder to the Harvey Hurricane event, I was only just notified by email of the Applicant's motion to dismiss me from the proceedings.
Applicant's motion for dismissal is therefore opposed.

Respectfully submitted,

Joe Walker PE

Certificate of notification. I hereby certify that ...

John Hampton was copied by email

Ashley Nwoma was copied by email

Public Utility Commission of Texas, Central Records, by USPS

Joe Walker PE