



Control Number: 49261



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DOCKET NO. 49261

RECEIVED

COMPLAINT OF MICHAEL E.  
MOORE AGAINST C WILLOW  
WATER COMPANY

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§  
§

2019 SEP 10 AM 10:27  
PUBLIC UTILITY COMMISSION

PUBLIC UTILITY COMMISSION  
OF TEXAS

**COMMISSION STAFF'S FIRST REQUEST FOR INFORMATION  
TO MICHAEL E. MOORE  
QUESTION NOS. STAFF 1-1 THROUGH STAFF 1-6**

Pursuant to 16 Texas Administrative Code (TAC) § 22.144, the Staff of the Public Utility Commission of Texas (Staff) requests that Michael E. Moore provide the following information and answer the following question(s) under oath. The question(s) shall be answered in sufficient detail to fully present all of the relevant facts, within the time limit provided by the Presiding Officer or within 20 days, if the Presiding Officer has not provided a time limit. Please copy the question immediately above the answer to each question. These question(s) are continuing in nature, and if there is a relevant change in circumstances, submit an amended answer, under oath, as a supplement to your original answer. State the name of the witness in this cause who will sponsor the answer to the question and can vouch for the truth of the answer.

Provide an original and three copies of your answers to the questions to the Filing Clerk, Public Utility Commission of Texas, 1701 N. Congress Avenue, P.O. Box 13326, Austin, Texas 78711-3326.

Dated: September 10, 2019

Respectfully submitted,

**PUBLIC UTILITY COMMISSION OF TEXAS  
LEGAL DIVISION**

Margaret Uhlig Pemberton  
Division Director

Karen S. Hubbard  
Managing Attorney



Eleanor D'Amrosio  
State Bar No. 24097559  
1701 N. Congress Avenue  
P.O. Box 13326  
Austin, Texas 78711-3326  
(512) 936-7021  
(512) 936-7268 (facsimile)  
Eleanor.Dambrosio@puc.texas.gov

**DOCKET NO. 49261  
CERTIFICATE OF SERVICE**

I certify that a copy of this document will be served on all parties of record on September 10, 2019 in accordance with 16 TAC § 22.74.

  
Eleanor D'Amrosio

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**COMMISSION STAFF'S FIRST REQUEST FOR INFORMATION  
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QUESTION NOS. STAFF 1-1 THROUGH STAFF 1-6**

**DEFINITIONS**

- A. "You," refers to Michael E. Moore and any person acting or purporting to act on their behalf, including without limitation, attorneys, agents, advisors, investigators, representatives, employees or other persons.
- B. "Document" includes any written, recorded, or graphic matter, however produced or reproduced, including but not limited to correspondence, telegrams, contracts, agreements, notes in any form, memoranda, diaries, voice recording tapes, microfilms, pictures, computer media, work papers, calendars, minutes of meetings or other writings or graphic matter, including copies containing marginal notes or variations of any of the foregoing, now or previously in your possession. In the event any documents requested by this Request for Information have been transferred beyond the Company's control, describe the circumstances under which the document was destroyed or transferred and provide an exact citation to the subject document. In the event that documents containing the exact information do not exist, but documents do exist which contain portions of the required information or which contain substantially similar information, then the definition of "documents" shall include the documents which do exist and these documents will be provided.

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**COMMISSION STAFF'S FIRST REQUEST FOR INFORMATION  
TO MICHAEL E. MOORE  
QUESTION NOS. STAFF 1-1 THROUGH STAFF 1-6**

**INSTRUCTIONS**

- 1) Pursuant to 16 TAC § 22.144(c)(2), Staff requests that answers to the requests for information be made under oath.
- 2) Please copy the question immediately above the answer to each question. State the name of the witness in this cause who will sponsor the answer to the question and can vouch for the truth of the answer.
- 3) These questions are continuing in nature, and if there is a relevant change in circumstances, submit an amended answer, under oath, as a supplement to your original answer.
- 4) Words used in the plural shall also be taken to mean and include the singular. Words used in the singular shall also be taken to mean and include the plural.
- 5) The present tense shall be construed to include the past tense, and the past tense shall be construed to include the present tense.
- 6) If any document is withheld under any claim of privilege, please furnish a list identifying each document for which a privilege is claimed, together with the following information: date, sender, recipients or copies, subject matter of the document, and the basis upon which such privilege is claimed.
- 7) Pursuant to 16 TAC § 22.144(h)(4), if the response to any request is voluminous, please provide a detailed index of the voluminous material.
- 8) Staff requests that each item of information be made available as it is completed, rather than upon completion of all information requested.

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**COMMISSION STAFF'S FIRST REQUEST FOR INFORMATION  
TO MICHAEL E. MOORE  
QUESTION NOS. STAFF 1-1 THROUGH STAFF 1-6**

- Staff 1-1 Please provide the date you began occupying 303 Hickory Trail as your permanent residence.
- Staff 1-2 Admit or deny that the property at 303 Hickory Trail was receiving water service on the date provided in response to Staff 1-1.
- Staff 1-3 Admit or deny that the property at 303 Hickory Trail received water service continuously from the date provided in response to Staff 1-1 through September 13, 2018.
- Staff 1-4 If the date provided in response to Staff 1-1 is more than two weeks before September 13, 2018, please explain the reasons for the delay in submitting an application for water service to C-Willow.
- Staff 1-5 Please provide all written correspondence, if any, between you and Keith Johanson or any employee of Keith Johanson, regarding who to contact to apply for water service to 303 Hickory Trail in your name.
- Staff 1-6 Please explain how you first learned of the \$1,808.86 water bill that is the basis for your complaint.