



Control Number: 49261



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DOCKET NO. 49261

**COMPLAINT OF MICHAEL E.
MOORE AGAINST C WILLOW
WATER COMPANY**

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**PUBLIC UTILITY COMMISSION
OF TEXAS**

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**COMMISSION STAFF'S SECOND REQUEST FOR INFORMATION
TO C WILLOW WATER COMPANY
QUESTION NOS. STAFF 2-1 THROUGH STAFF 2-9**

Pursuant to 16 Texas Administrative Code (TAC) § 22.144, the Staff of the Public Utility Commission of Texas (Staff) requests that C Willow Water Company 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

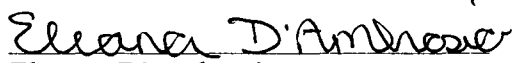
Karen S. Hubbard
Managing Attorney



Eleanor D'Ambrosio
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'Ambrosio

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**COMMISSION STAFF'S SECOND REQUEST FOR INFORMATION
TO C WILLOW WATER COMPANY
QUESTION NOS. STAFF 2-1 THROUGH STAFF 2-9**

DEFINITIONS

- A. "C Willow," refers to C Willow Water Company 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 SECOND REQUEST FOR INFORMATION
TO C WILLOW WATER COMPANY
QUESTION NOS. STAFF 2-1 THROUGH STAFF 2-9**

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 SECOND REQUEST FOR INFORMATION
TO C WILLOW WATER COMPANY
QUESTION NOS. STAFF 2-1 THROUGH STAFF 2-9**

- Staff 2-1 Please provide a copy of all policies related to the procedure C Willow uses to confirm the accuracy of a meter reading. If no written policy exists, please provide a written explanation of the procedures used to confirm the accuracy of a meter read.
- Staff 2-2 Please provide a copy of all policies related to the procedure a customer must use to discontinue water service at an address served by C-Willow or to close an account with C-Willow. If no written policy exists, please provide a written explanation of the procedures a customer must use to discontinue service.
- Staff 2-3 Please provide a copy of all bills sent to Keith Johanson between June 1, 2018 and November 1, 2018 for Account No. 7030 for service at 303 Hickory Trail.
- Staff 2-4 For the following questions, please refer to C Willow's responses to Staff's 1st Request for Information.
- Staff 2-5 Referencing Work Order #101 dated August 29, 2018, please provide the name of the person who requested the work order and the name of the person who issued the work order, explain why the work order was issued, describe the work performed pursuant to the order, and provide the date the work was completed.
- Staff 2-6 Referencing Work Order #101 dated August 29, 2018, please explain the meaning of the handwritten notation, "No Reading in book."
- Staff 2-7 Referencing Work Order # 101 dated August 29, 2018, and the Meter Reader's List dated August 20, 2018 (covering usage between July 28, 2018 and August 29, 2018), admit or deny that the meter reading of 0504350 was the reading on September 14, 2018. If deny, please provide the date on which the 0504350 reading was performed.
- Staff 2-8 Referencing the Meter Reader's List dated August 20, 2018 (covering usage between July 28, 2018 and August 29, 2018), admit or deny that Keith Johanson was the customer for Account 7030 for service at 303 Hickory Trail. If deny, please provide the date Mr. Johanson cancelled the account and all documents supporting the cancellation date.
- Staff 2-9 Referencing the Meter Reader's List dated September 28, 2018, admit or deny that Keith Johanson was the customer for Account 7030 for service at 303 Hickory Trail. If deny, please provide the date Mr. Johanson cancelled the account and all documents supporting the cancellation date.