

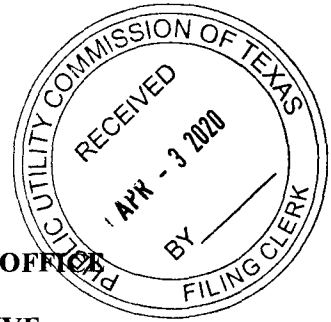
Control Number: 49261



Item Number: 39

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SOAH DOCKET NO. 473-20-1120.WS
PUCT DOCKET NO. 49261



COMPLAINT OF MICHAEL E. MOORE
AGAINST C WILLOW WATER
COMPANY

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BEFORE THE STATE OFFICE
OF
ADMINISTRATIVE
HEARINGS



DIRECT TESTIMONY OF
KATHRYN EILAND
RATE REGULATION DIVISION
PUBLIC UTILITY COMMISSION OF TEXAS

APRIL 3, 2020

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- Attachment KE-1 Regulatory Resume
- Attachment KE-2 List of Testimony
- Attachment KE-3 Usage Adjustment Calculation
- Attachment KE-4 Calculation of One-Time Refund with Interest

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I. INTRODUCTION OF WITNESS

Q. Please state your name and business address.

A. My name is Kathryn Eiland. My business address is 1701 N. Congress Avenue, Austin, Texas 78711-3326.

Q. By whom are you currently employed and in what capacity?

A. I am employed by the Public Utility Commission of Texas (Commission) as a Financial Analyst in the Rate Regulation Division.

Q. What are your principal responsibilities at the Commission?

A. I am responsible for reviewing formal complaints, certificate of convenience and necessity (CCN) applications and amendments, sale/transfer/merger applications, requests for authority to change rates, stock transfers, and financial and managerial reviews. I am also responsible for preparing testimony and exhibits for contested case matters involving investor-owned water and sewer retail public utilities and assisting with settlement negotiations.

Q. Please state your educational background and professional experience.

A. I have provided a summary of my educational background and professional experience in Attachment KE-2 to my direct testimony.

Q. Have you previously filed testimony before the Commission or SOAH?

A. Yes. I have provided a summary of my testimony in Attachment KE-3.

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II. PURPOSE AND SCOPE OF TESTIMONY

Q. What is the purpose of your testimony in this proceeding?

A. I will present testimony as to whether C-Willow Water Company (C-Willow) has billed Mr. Michael E. Moore (Complainant) appropriately for water service and any refund calculations.

Q. What is the scope of your review?

A. I reviewed all the filings in Commission Docket No. 49261 and 16 TAC § 24.161.

III. WATER SERVICE UNDER 16 TAC § 24.161

Q. What is a retail public utility?

A. A retail public utility is a person, corporation, public utility, water supply or sewer service corporation, municipality, political subdivision or agency operating, maintaining, or controlling in this state facilities for providing potable water service or sewer service, or both, for compensation.¹

Q. Is C-Willow a retail public utility?

A. Yes. C-Willow is owned by Shady Oaks Water LP holding water Certificate of Convenience Number 12090.

Q. What is a qualified service applicant?

¹ 16 TAC § 24.3 (59)

1 A. A qualified service applicant is an applicant who has met all of the retail public utility's
2 requirement contained in its tariff, schedule of rates, or service policies and regulations for
3 extension of service including the delivery to the retail public utility of any service connection
4 inspection certifications required by law.²

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6 **Q. When should a retail public utility serve each qualified service application within its
7 certificated area?**

8 A. A retail public utility should serve each qualified service applicant as soon as practical after
9 receiving a completed application.³

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11 **Q. How does a person become a qualified service applicant?**

12 A. A person becomes a qualified service applicant by completing and signing an application or
13 contract form for service, paying any required fees (deposits, reconnect, tap, extension fees,
14 etc. as applicable), and granting easements if required.

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16 **IV. C-WILLOW AND ITS BILLING TO COMPLAINANT**

17 **Q. When did C-Willow receive Mr. Moore's application for service at 303 Hickory Trail?**

18 A. September 13, 2018.⁴

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20 **Q. When did C-Willow accept Mr. Moore's application for service at 303 Hickory Trail?**

21 A. September 14, 2018.⁵

² 16 TAC § 24.161 (a)

³ *Id.*

⁴ Workpaper KE-1, C-Willow's Confidential Response to Staff RFI 1-1 filed April 26, 2019.

⁵ Workpaper KE-2, C-Willow's Confidential Response at 7 filed April 26, 2019.

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2 **Q. What date did Mr. Moore pay any required fees?**

3 A. Mr. Moore paid a deposit and transfer fee on September 13, 2018.⁶

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5 **Q. What date did C-Willow obtain a meter read to end service in Keith Johanson's name,**
6 **who was the previous customer at the address?**

7 A. September 14, 2018.⁷

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9 **Q. What was the meter read on that date?**

10 A. The meter read obtained that date was 0504350.⁸

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12 **Q. Was the above meter reading reflected as the start read on Mr. Moore's first bill?**

13 A. No, a start read of 0006690 was on Mr. Moore's first bill.⁹

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15 **Q. Was this reading initially used to bill another account?**

16 A. Yes, this reading was initially used in billing the previous person who had service at 303
17 Hickory Trail.¹⁰

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19 **Q. Why did C-Willow adjust the meter read from Keith Johanson's account and use it on**
20 **Mr. Moore's first bill?**

⁶ Workpaper KE-3, C-Willow's Response to Order No. 1 at 9 filed March 19, 2019.

⁷ Workpaper KE-4, C-Willow's Confidential Response at 37 filed April 26, 2019.

⁸ Workpaper KE-5, C-Willow's Response to Staff RI 2-7 filed September 10, 2019.

⁹ Workpaper KE-6, C-Willow's Confidential Response at 65 filed April 26, 2019.

¹⁰ Workpaper KE-7, C-Willow's Response to Order No. 1 at 8 filed March 19, 2019.

1 A. Keith Johanson was the builder and former customer at 303 Hickory Trail. On October 2,
2 2018, Mr. Johanson clarified the closing date on the home was July 28, 2018. Additionally,
3 Mr. Johanson forgot to contact C-Willow to cut off the service.¹¹ Thus, service was not
4 disconnected at that time.

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7 **Q. Did Mr. Moore take possession of 303 Hickory Trail prior to September 13, 2018?**

8 A. Yes.¹²

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10 **Q. Does Mr. Moore's taking possession of the property prior to September 13, 2018 permit**
11 **C-Willow to bill him for service prior to that date?**

12 A. No. Even though Mr. Moore took possession of the property before completing an
13 application for water service, Mr. Moore would likely not be considered a qualified service
14 applicant prior to September 13, 2018.¹³ C-Willow did not have proper consent to bill him
15 until his application was accepted, at which point he became a qualified applicant.¹⁴ There
16 was no contract for service at that time to make Mr. Moore a qualified service applicant.
17 Additionally, the previous occupant for service at the address did not contact C-Willow to
18 discontinue service before Mr. Moore's application was received and approved. Therefore,
19 Mr. Moore would likely not be considered a qualified applicant until September 13, 2018
20 when he submitted an application to C Willow.¹⁵

¹¹ Workpaper KE-1, C-Willow's Response to Staff RFI 2-9 filed September 10, 2019.

¹² Formal Complaint at 1-2 filed February 26, 2019.

¹³ 16 TAC § 24.161(a)

¹⁴ *Id.*

¹⁵ *Id.*

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2 **V. CONCLUSION**

3 **Q. What is your recommendation and conclusion?**

4 A. I recommend that C-Willow refund Mr. Moore \$1,783.13¹⁶. This amount includes a credit
5 of \$1,717.87¹⁷ for 495,280 gallons of water, \$15.00 in late fees and \$50.26 in interest.

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8 **Q. Does this conclude your direct testimony?**

9 A. Yes. I reserve the right to supplement this testimony during the proceeding as new
10 evidence is presented.

¹⁶ Attachment KE-4

¹⁷ Attachment KE-3

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1701 North Congress Avenue
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REGULATORY EXPERIENCE:

Financial Analyst, Financial Review Section
Public Utility Commission of Texas, Rate Regulation Division
Employed: February 1, 2018 to present.

Duties: Review formal complaints, certificate of convenience and necessity (CCN) applications and amendments, sale/transfer/merger applications, requests for authority to change rates, stock transfers, and financial and managerial reviews. Prepare testimony and exhibits for contested case matters involving investor-owned water and sewer retail public utilities and assisting with settlement negotiations.

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SOAH 473-19-2460

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SOAH 473-20-1116.WS

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Michael E. Moore
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Adjusted usage for service from September 14, 2018 to October 1, 2018

October 1, 2018 meter reading	0505600
September 14, 2018 meter reading	<u>-0504350</u>
Total usage in gallons	0001250
Total usage divided by 1,000 for billing	1.25

C Willow Rate Schedule

Meter Size

5/8" or 3/4"	\$28.00
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Gallorage charge (per 1,000 gallons)

0-5000	\$2.75
5001-150000	\$3.00
15001-20000	\$3.25
20001 and up	\$3.50

Charges for adjusted usage charges (per 1,000 gallons)

\$2.75 x 1.25	\$	3.44
Charge for meter size	+	<u>28.00</u>
Staff recommended charge	\$	31.44

Refund calculation

Usage charges billed on September 01, 2018	\$1,749.75
Adjusted usage charges	<u>- 31.44</u>
Staff recommended adjustment	\$1,717.87

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Staff recommended adjustment	\$1,717.87

Michael E. Moore
 One-time refund with Interest
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Historical Record of Interest Rates Set by the Public Utility Commission of Texas
<http://www.puc.texas.gov/industry/electric/reports/HRates/HistRates.pdf>

Calendar Year	Interest
2018	1.05%
2019	1.99%
2020	2.35%

To coincide with 3
 month payment
 plan, overbilled

Amount Overbilled amount divided by 3 3 Late Fees of
 \$1,717.87 \$572.62 \$5

Month	Interest	Payment + Billed Late Fee	Balance
Beg. Bal.			
Sep-18		\$5.00	\$5.00
Oct-18	0	\$577.62	\$582.62
Nov-18	1	\$577.62	\$1,160.75
Dec-18	1	\$572.63	\$1,734.40
Jan-19	3	\$0.00	\$1,737.28
Feb-19	3	\$0.00	\$1,740.16
Mar-19	3	\$0.00	\$1,743.04
Apr-19	3	\$0.00	\$1,745.93
May-19	3	\$0.00	\$1,748.83
Jun-19	3	\$0.00	\$1,751.73
Jul-19	3	\$0.00	\$1,754.63
Aug-19	3	\$0.00	\$1,757.54
Sep-19	3	\$0.00	\$1,760.46
Oct-19	3	\$0.00	\$1,763.38
Nov-19	3	\$0.00	\$1,766.30
Dec-19	3	\$0.00	\$1,769.23
Jan-20	3	\$0.00	\$1,772.70
Feb-20	3	\$0.00	\$1,776.17
Mar-20	3	\$0.00	\$1,779.65
Apr-20	3	\$0.00	\$1,783.13
Total	\$50.26	\$1,732.87	\$1,783.13

Late fees obtained from C-Willow's Response to Order No. 1 at 9, Workpaper KE-10²
 Formal Complaint at 4, Mr. Moore's request to pay \$1808.86 bill in 3 payments, Workpaper KE-11³

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