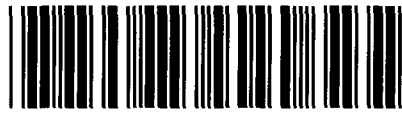


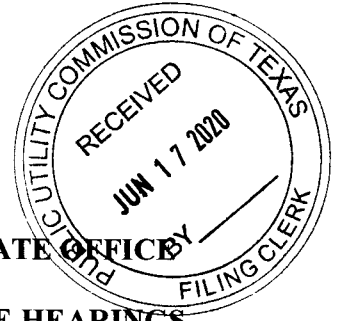
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PUC DOCKET NO. 49261



COMPLAINT OF MICHAEL E. § BEFORE THE STATE OFFICE
MOORE AGAINST C WILLOW § OF
WATER COMPANY § ADMINISTRATIVE HEARINGS

COMMISSION STAFF WITNESS IDENTIFICATION AND PRE-FILED EXHIBIT LIST

COMES NOW the Staff of the Public Utility Commission of Texas (Staff), representing the public interest and files this Staff’s Witness Identification and Pre-filed Exhibits. In support thereof, Staff shows the following:

I. BACKGROUND

On February 26, 2019, Michael E. Moore (Moore) filed a complaint against Shady Oaks Water, L.P. dba C Willow Water Company (C-Willow) regarding water billing and related charges. The complaint was filed pursuant to 16 Texas Administrative Code (TAC) § 22.242. On March 19, 2019, C Willow filed its response to the complaint.

On June 15, 2020, State Office of Administrative Hearings (SOAH) Order No. 4 was issued requiring all parties to pre-file exhibits and to file a witness list with the names and phone numbers for the witnesses they intend to call to testify during the hearing.

II. WITNESS IDENTIFICATION

Staff’s witness will be:

Kathryn Eiland
512-936-7020

III. COMMISSION STAFF EXHIBIT LIST

Staff moves to admit the follow exhibits:

Number	Description
1	Direct Testimony of Kathryn Eiland
2	Confidential Workpapers to Direct Testimony of Kathryn Eiland Available through PUC Central Records, Item 41 of this docket

3	C-Willow/Shady Oaks Response to Staff RFI 1-1 through 1-10
4	Redacted Water Service Agreement between M. Moore and C Willow
5	Redacted M. Moore Home Closing Disclosure for 303 Hickory Trail
6	Redacted Meter Reader's List
7	Redacted Customer History for 303 Hickory Trail
8	Billing Invoices for M. Moore (303 Hickory Trail)
9	C-Willow Work Order for K. Johanson
10	C-Willow /Shady Oaks Response to Staff RFI 2-1 through 2-9
11	C-Willow /Shady Oaks Response to Staff RFI 3-1 through 3-21
12	Meter Readings for 303 Hickory Trail from 1/28/2018 to 5/1/2020
13	Existing Workorder List for C-Willow
14	Consumption Analysis Report by C-Willow
15	M. Moore Response to Staff's First RFI 1-1 through 1-6
16	M. Moore Response to Staff's First RFI 2-1 through 2-5
17	M. Moore Formal Complaint
18	M. Moore Direct Testimony
19	C-Willow/Shady Oaks Response to Formal Complaint
20	C-Willow/Shady Oaks Direct Testimony

Staff has attached Staff Exhibit 1, Staff Exhibit 3, and Staff Exhibits 10 through 20 to this pleading. Staff Exhibit 2 “Confidential Workpapers of Kathryn Eiland” is a confidential exhibit and can be accessed by requesting access to Item No. 41 in Docket No. 49261 through the Public Utility Commission of Texas Central Records office.

Staff Exhibits 4 through 9 are confidential documents filed in Item No. 8 in Docket No. 49261. Staff currently has a pending motion to declassify portions of these documents and the redacted versions have been provided with that pleading confidentially. Should Staff’s motion be granted, Staff will file the redacted versions of Staff Exhibit 4 through 9 separately. Staff will provide a copy of Staff Exhibits 4 through 9 to any parties who have signed a protective order certification in this docket, marked confidentially, for purposes of this hearing.

Dated: June 17, 2020

Respectfully submitted,

**PUBLIC UTILITY COMMISSION OF TEXAS
LEGAL DIVISION**

Rachelle Nicolette Robles
Division Director

Heath D. Armstrong
Managing Attorney

/s/ Robert Dakota Parish
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CERTIFICATE OF SERVICE

I certify that, unless otherwise ordered by the presiding officer, notice of the filing of this document was provided to all parties of record via electronic mail on June 17, 2020, in accordance with the Order Suspending Rules, issued in Project No. 50664.

/s/ Robert Dakota Parish
Robert Dakota Parish

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

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

§
§
§
§

**BEFORE THE STATE OFFICE
OF
ADMINISTRATIVE
HEARINGS**



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

APRIL 3, 2020

**PUC Staff Exhibit No. 1
SOAH DOCKET NO. 473-20-1120.WS
PUC DOCKET NO. 49261**

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Attachments

- 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