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June 17, 2020

Michael Moore (Complainant), Against C Willow Water Company  
SOAH Docket No. 473-20-1120.WS  
PUC Docket No. 49261

Re: Exhibits 1-8

I, Michael Moore, am submitting the following Exhibits 1-8 for the Telephonic Hearing set for June 23, 2020 at 9:00 am. Thank you.

Respectfully,

Michael Moore  
(210) 861-1746

PUC  
DOCKET # 49261

EXHIBIT #1

**MICHAEL E. MOORE, COMPLAINANT**

**AGAINST**

**C WILLOW WATER COMPANY**

SOAH DOCKET NO. 473-20-1120.WS

PUC DOCKET NO. 49261

DIRECT TESTIMONY OF MICHAEL E. MOORE

February 20, 2020

Q. Please state your name and home address.

A. My name is Michael E. Moore. My home address is 303 Hickory Trail, Lavernia, TX 78121

Q. Are you the homeowner?

A. Yes.

Q. What was the date you moved in?

A. We closed on the house July 8, 2018 and moved in July 9, 2018 .

Q. Who is your water service provider?

A. C Willow Water Company.

Q. What is your account number with C Willow Water Company?

A. Account number 7030.

Q. When did you first try contacting the water company?

A. I did not receive any contact information for water service when we moved in. I called the Wilson County Abstract Office to see if they had any information in their paperwork and know who to contact and they did not.

My wife and I continued our efforts in search for contact information. I called SS Water Company and Lavernia Chamber of Commerce to see if they knew and they did not know. So, I Googled Oak Hollow Estates water online. I found some information on the Texas.gov.puc search link. I called and emailed the contact information shown on the website on July 16, 2018. The phone only had a constant busy signal. Therefore, I sent an email to the email address listed for C Willow Water Company. I never received a reply. I called the builder several times and he finally texted me back the contact information for the owners of C Willow Water Company on September 12, 2018.

Q. Did you file an informal complaint against C Willow Water? If yes, why?

A. Yes. C Willow Water Company emailed my first water bill on October 3, 2018 in the amount of 1808.86 stating I used 495,280 gallons of water. C Willow Water Company did not investigate or explain the reason for the high water usage and threatened to shut off my water if we did not pay the bill.

Q. Did you file a formal complaint? If so, why?

A. Yes. On February 21, 2019. Upon filing my informal complaint on November 12, 2018 I had not heard from C Willow Water Company in attempt to resolve the issue of the high water bill. Therefore, I filed my Formal Complaint #CP2018110366 on February 21, 2019 against C Willow Water Company.

Q. Can you provide a description of the facts?

A. Yes. I bought my new custom home on July 8, 2018 and moved in on July 9, 2018. C Willow Water Company emailed my first water bill on October 3, 2018 in the amount of \$1808.86 stating I used 495,280 gallons of water. C Willow Water stated my beginning meter reading was 6690 and ending in 501,970. It is not possible for me and my wife to use that amount of water. I do not have any landscaping, grass, no swimming pool or leaks, no standing water or moisture anywhere and we use bottled water. My house is under warranty so I called the building and he advised me to call the plumber to come and inspect our house inside and out to check for leaks. Double S Plumbing came out October 8, 2018 and did not find anything wrong. I submitted a copy of the invoice/report to C Willow Water Company by email. My November 1, 2018 bill showed 2910 gallons of water used and the bill was \$33.84. My first contact with Sandy Strozier with C Willow Water Company regarding this matter was after I received my first bill of \$1808.86. I called their office numerous times and only reached voicemail. I was unable to leave messages because the voicemail box was full. When I finally reached Sandy by phone she stated that they go by the water meter only and the problem was not theirs and I had to pay the bill or they were going to shut my water off. I asked Sandy to make payment arrangements and she allowed me to divide the bill into three payments so my water service would not be shut off. Sandy stated that if I did not pay my bill the meter would be pulled and I would have to pay an additional reconnection fee. I asked Sandy to provide me copies of all prior water bills since the water meter was first installed to compare and confirm the beginning and ending meter readings were in alignment with my bill. She explained to me she could not release that information because of privacy. Sandy reiterated that the problem was not on their end and to take it up with my builder. The builder, Keith Johanson told me the problem was not his and out of his hands. There is an error somewhere. C Willow Water Company will not work with me in an effort to resolve the issue.

Q. Did you ask C Willow Water Company to test your water meter?

A. Yes. I spoke to David Strozier, (owner), by phone and asked him if the meter was tested. He responded by stating he tested the meter and it was fine and if I wanted to test it myself, I could get a five-gallon bucket, read the meter, fill the bucket up and re-read the meter and that the second reading should be five gallons more than the first reading. Since this is not my area of expertise and my house is under warranty, I used the professional and accurate route by calling Double S Plumbing to inspect, which after inspecting no leaks were found.

Q. Have you had any other high bills since your October 3, 2018 bill?

A. No. As a matter of fact the following bill in November 2018 I only used 2910 gallons of water. If I had a leak or any kind of problem and no repairs were done, my bill would have continued to be high. It has never been high again to date. My average water usage is approximately 2700 - 3000 gallons per month.

Q. Have you done any research to get an idea of actually how much 495,280 gallons of water looks like and compared to so you can get a visual of such a large amount of water?

A. Yes. I called Reynolds Trucking Company to see how many gallons their tankers hold and they told me they hold 300 gallons. It would take 1,650 tanker trailers full to hold 495,280 gallons of water and they would be lined up for miles. The average swimming pool is 12,000 gallons and it would have to be emptied and filled up 41 times.

Q. Do you have proof that C Willow Water is not reading and recording your meter correctly?


A. Yes. My wife, Amy Moore did a random check and watched the meter reader in the red truck, with C Willow Water, read our meter on January 28, 2020. My wife immediately took a picture of the water meter after he left to match the reading to our February 2020 bill to check for accuracy of this month's bill. The bill C Willow sent us for February 2020 was wrong. The details in the phone of the date and time the picture was taken match the date that our bill was read. The reading on February bill was 551640 to 553640 (exactly 2000 gallons) and the true ending meter reading was 554780. The correct amount of gallons used should have been 3140 gallons. C Willow made an error and if they had read it correctly, we would owe more on our bill. The bills beginning and ending numbers both end in ...640. Tells me it was not read correctly and should match my reading. I have not yet brought it to their attention, because it's this month's bill, the case is active and I did not want their records to be altered before I submitted proof that their recording for February was wrong. After filing my testimony on February 21, 2020. My wife, Amy Moore, said the meter reader lifted the green lid and looked at our meter and did not write anything down (no pen, no paper), then he got back in his truck and drove off. Amy is willing to testify under oath if necessary to what she observed that day as well as taking the picture. It is in her phone 210-240-5017. Since we moved in on July 9, 2020 there have been many errors on our bills, which also included bogus and false late charges that they had to correct once we notified them of their errors. C Willow corrected those bills and issued me a corrected bill. We have never been late on a bill as long as we have been a customer of C Willow Water. Since this error I looked back the past three months and all of the bills from November 2019 to January 2020 have all been \$33.84, but the gallons used are all different.

- Q. Do you know of any reason why Sandy Strozier would contact Eleanor D'Ambrosio, Attorney for Texas PUC, asking her to inform you by email that she was going to file a police report for theft of services and the police may call you or come by your house to ask you questions?
- A. No. There was no theft of service because I paid all my bills, including the October 3, 2018 bill.
- Q. Do you feel that C Willow Water Company addressed and tried to resolve the problem?
- A. No. I feel I was taken advantage of with an incorrect bill that cannot be explained along with all of the other discrepancies that are surfacing in their other billings, as well as the unprofessional manner in which C Willow Water Company operates.
- Q. What is your statement of relief?
- A. I want C Willow Water Company to correct the October 3, 2018 bill by calculating an overall average of gallons used from all invoices to date, remove all late fees, make adjustments accordingly and reimburse the balance of 1717.87 to me which is what the Commission originally requested in May 2019.
- Q. Do you think you are being treated fairly by C Willow Water Company?
- A. No. Companies have policies and procedures in place in order that customers are treated fairly. As a customer I do not have the knowledge of the policies and procedures C Willow Water is held accountable for, but after reviewing documents in this case and the Commission's investigation, I know now that C Willow has failed me as a customer and I pray the Public Utility Commission holds them accountable for their failures for breaking policies and procedures related to this case. I have done my part and faithfully paid my bills on time.
- Q. Do you believe you have proven your case and this case should be ruled in your favor?
- A. Yes. I have proven my case by using every avenue possible to me as a new homeowner, which is getting my plumbing inspected by a professional and I did under warranty, along with copies of all documentation, bills, emails, and text communication. I also researched to understand the magnitude of that amount of water and what it would look like and be equivalent to. My proof is a good report from the plumber, no leaks, no puddles, no wet ground, no yard or landscaping, no pool and only two people reside in my home. Too many errors have been made by C Willow Water on my bills dating back to my first bill. There is no way possible for me to use 495,280 gallons of water in one month. Based on my average gallons used per year, it would take approximately 12 – 14 years for me to use up that amount of water.

## CONCLUSION

- Q. Does this conclude your direct testimony?

A. Yes. This concludes my direct testimony.



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Michael E. Moore, Complainant



PUC  
DOCKET # 49261

EXHIBIT # 2