



Control Number: 49261



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MICHAEL E. MOORE, COMPLAINANT
AGAINST
C-WILLOW WATER COMPANY
SOAH DOCKET NO. 473-20-1120.WS
PUC DOCKET NO. 49261



July 8, 2020

WRITTEN CLOSING ARGUMENTS

My name is Michael Moore and I reside at 303 Hickory Trail, Lavernia, TX 78121 and have been a customer of C Willow Water Company since September 14, 2018.

On November 12, 2018 I filed an Informal Complaint with the Public Utility Commission regarding a high water bill because C-Willow Water Company stated I used 495,280 gallons of water. Prior to that date, I contacted C-Willow and said there must be a mistake, because there was no way I could have used that large amount of water and I was told that the meter reading was correct and I had used that amount of water and I had to pay it or they will pull my meter, leaving me with no water source. C-Willow also told me that if they pulled my meter, I would have to pay 400.00 to have it reconnected. The Customer Protection Division of the Public Utility Commission of Texas (CPD) forwarded my complaint to C Willow Water regarding our high water bill. Your records will show C-Willow Water did not respond within the 21-day period and were in violation. Because the issue was not resolved, I filed a Formal Complaint against C-Willow Water Company on February 21, 2019.

On July 8, 2018 my wife and I became new homeowners at 303 Hickory Trail, Lavernia, Texas 78121. Upon moving in, I was not given any information regarding names or contact information of the utility companies. I contacted the title company, the builder, Lavernia Chamber of Commerce, SS Water Company, a google search for the owner of C-Willow Water Company and also searched the Public Utility Commission website. After all the attempts no one knew who the water company was for Oak Hollow Estates Subdivision. I found C-Willow contact information on the PUC website, which stated Richard Scott was the owner and had an email address and phone number. I sent an email July 16, 2018 notifying Mr. Scott we moved into my new home and wanted to establish service and if he was not the correct person of contact, to please let me know. I never got a response back. I continued to call the builder, Keith Johanson and he finally gave me an email address on September 12, 2018 to David and Sandy Strozier. On September 12, my wife, Amy Moore immediately sent an email to David and Sandra Strozier advising them I needed to set up water service. On September 13, 2018 I paid the deposit and setup charges totaling 85.00 and submitted my application for service. My application was approved and I became a customer of C-Willow Water Company on September 14, 2018.

I received my first bill on October 3, 2018 from C-Willow Water Company by email. The bill was backdated to August 10, 2018 and I was not a customer at that time. The amount of my bill was 1808.86

and the total amount of gallons used was 495,280. C Willow Water stated my beginning meter reading was 6690 and ending in 501,970.

I did not have landscaping, a pool, or a water hose and it was just my wife and I, so there was no reason for a high bill. I called my plumber, because my house was under warranty and Double S Plumbing came out and did an inspection. I have the document that shows there were no leaks found. The 495,280 gallons of water is equivalent to 1600 tanker trucks or filling the average 13,000 gallon swimming pool approximately 38 times. That is a remarkable amount of water to be used in such a short time period.

David Strozier attested that he did several 5 gallon bucket tests in front of me and my wife, and we at the time had never met him. As a matter of fact, I have never personally met him face to face to date. He did not tell the truth. My wife recently met him in April 2020 for the first time when he came out to my home to do a pressure test that he said the PUC requested he do, which was not true. The PUC never requested that of him. We did not authorize David Strozier to do the test on my property, but he did it anyway without permission. He did not make a prior appointment or give me a phone call to let me know he was coming.

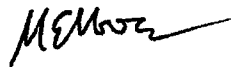
David Strozier attested to only having 3 employees, which two of the employees work in the office, and has 275 meters to read in one day and David Strozier is out in the field doing meter reads. Sandra Strozier attested that their computer system catches errors in advance and also alerts them of high water usage beforehand so they can investigate before the bills are sent out. I never received any contact from C-Willow Water Company about high water usage before billing. Their computer system did not catch that I had made my payments on time and late payments were issued in error.

C-Willow Water Company has not been very forthcoming and cooperative with me as their customer, gave me unwarranted threats, and mishandled our account overall. David Strozier threatened me during the hearing to file a Theft of Service charge against me for stealing water and illegally moving in. I did not do anything illegal. I paid all of my bills, one of which was the initial bill, which was paid in three installments per my agreement with Sandra Strozier, (under duress and stress of having my water cut-off), and all of my bills were paid on time. C-Willow Water Company cannot prove I used the water and my proof is the plumber's report. I also did not have any leaks or water standing around my house or on my property. David Strozier should have known I was occupying my home if he reads the meter every month like he attested he does on the 27th. I never got a knock on my door.

I am requesting that the PUC do a thorough audit and investigation of C-Willow Water's business practices to make sure they are abiding by the Texas Public Utility Commission's Rules and Regulations.

I am requesting that C Willow Water Company correct my October 3, 2018 bill by calculating an overall average of gallons used from all invoices beginning on September 14, 2018, when I became a customer of C Willow Water, to date, remove all late fees, make adjustments accordingly and reimburse the balance.

Respectfully,

A handwritten signature in black ink, appearing to read "Michael Moore", written above a horizontal line.

Michael Moore, Complainant