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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 22, 2020

ALL PARTIES WRITTEN RESPONSE

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.

I disagree with portions of C-Willow Water's closing arguments and they are as follows:

1. I did not "hire" a licensed plumber. I used the plumber Keith Johanson used when building my home as a warranty call to check for leaks or other plumbing issues that could have possibly added to excessive water usage. The plumber did not check to see if the water meter was installed correctly, because he did not install the meter and the meter did not belong to me or Double S Plumbing. It belongs to C-Willow Water Company. The plumber visually looked at the meter and said the meter was not spinning and that it was normal for the meter to rock back and forth like it was even when the water was not being used, which my wife misconstrued as spinning, because the red arrow was moving when the water was off. C-Willow stated they checked and reread the meter several times throughout this case. If this were true, C-Willow would have noticed immediately the meter was spinning, if it were actually spinning, and knew there was a problem somewhere. This proves the meter was never spinning.
2. C-Willow stated they start researching leaks immediately. They did not reach out to "the persons" occupying the home to notify them of a possible leak, because of high water usage according to the meter. They knew someone was living at 303 Hickory Trail, because there are rocking chairs and a bistro table on the back porch which are clearly visible from the water meter. They could have left a note on the door along with their phone number if they knew I was not a customer yet.
3. I do not agree that I could have used 495,280 gallons of water from July to August of 2018 and that David Strozier performed the five-gallon bucket test, because Amy and I never saw him do it and I never received a phone call or a notice that he did the five-gallon bucket test or any other type of inspection. I believe either the meter was inaccurate or read incorrectly and possibly tampered with or even replaced. David Strozier could not even provide a date or time that he performed the test. Yes, I work in San Antonio, but my wife does not work and is home all day and the water meter is clearly visible through our large living room and dining room windows.

4. I did not hire Keith Johanson to build my home. I hired a realtor to find us a new home and our realtor took care of the sale. Keith Johanson was the builder and it was partially complete when I signed an earnest money contract to purchase the home. The land and the house belonged to Keith Johanson and everything was built Keith Johanson's way and his responsibility from start to finish. I had no control of the plans or building process. I only purchased the house from Keith Johanson through my realtor. Keith Johanson and I signed our closing documents at different times and we were never in the same room together at any point.

5. I have never used unprofessional language in any communication I had with David Strozier or any C-Willow employee nor was I ever inappropriate at any time as David Strozier stated. In my career as a Controller of a company, I deal with all kinds of people on a daily basis, which includes irate customers. I am a professional businessman and maintain self-control in all my business dealings because I know nothing gets accomplished when slinging profanity or threats. C-Willow is a business and the company that supplies my water. There is no reason to communicate any other way than professional and appropriate. If I disagree with a person and we cannot come to an agreement, that is when I do the right thing, for example, like take this matter one step higher by submitting a complaint with the Public Utility Commission of Texas for further assistance in resolving this matter in an appropriate and professional manner.

6. I would never threaten anyone and did not threaten David Strozier or anyone at C-Willow Water at any point. It is not in my character to do so.

7. I agree with the PUC Staff's closing arguments submitted on July 8, 2020.

Respectfully submitted,



Michael Moore, Complainant