



Control Number: 49261



Item Number: 7

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DOCKET NO. 49261

RECEIVED

COMPLAINT OF MICHAEL E.
MOORE AGAINST C WILLOW
WATER COMPANY

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§
§

PUBLIC UTILITY COMMISSION

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PUBLIC UTILITY COMMISSION
OF TEXAS
CLERK

**COMMISSION STAFF'S FIRST REQUEST FOR INFORMATION
TO C WILLOW WATER COMPANY
QUESTION NOS. STAFF 1-1 THROUGH STAFF 1-10**

Pursuant to 16 Texas Administrative Code Ann. (TAC) § 22.144, the Staff of the Public Utility Commission of Texas (Staff) requests that C Willow Water Company by and through their attorneys of record, provide the following information and answer the following question(s) under oath. The question(s) shall be answered in sufficient detail to fully present all of the relevant facts, within the time limit provided by the Presiding Officer or within 20 days, if the Presiding Officer has not provided a time limit. Please copy the question immediately above the answer to each question. These question(s) are continuing in nature, and if there is a relevant change in circumstances, submit an amended answer, under oath, as a supplement to your original answer. State the name of the witness in this cause who will sponsor the answer to the question and can vouch for the truth of the answer.

Provide an original and three copies of your answers to the questions to the Filing Clerk, Public Utility Commission of Texas, 1701 N. Congress Avenue, P.O. Box 13326, Austin, Texas 78711-3326.

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Dated: April 18, 2019

Respectfully submitted,

**PUBLIC UTILITY COMMISSION OF TEXAS
LEGAL DIVISION**

Margaret Uhlig Pemberton
Division Director

Katherine Lengieza Gross
Managing Attorney

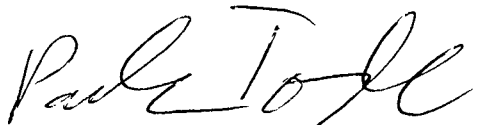


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CERTIFICATE OF SERVICE

I certify that a copy of this document will be served on all parties of record on April 18, 2019 in accordance with 16 TAC § 22.74.



Patrick D. Todd

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**COMMISSION STAFF'S FIRST REQUEST FOR INFORMATION
TO C WILLOW WATER COMPANY
QUESTION NOS. STAFF 1-1 THROUGH STAFF 1-10**

DEFINITIONS

- A. "C Willow," refers to C Willow Water Company and any person acting or purporting to act on their behalf, including without limitation, attorneys, agents, advisors, investigators, representatives, employees or other persons.
- B. "Document" includes any written, recorded, or graphic matter, however produced or reproduced, including but not limited to correspondence, telegrams, contracts, agreements, notes in any form, memoranda, diaries, voice recording tapes, microfilms, pictures, computer media, work papers, calendars, minutes of meetings or other writings or graphic matter, including copies containing marginal notes or variations of any of the foregoing, now or previously in your possession. In the event any documents requested by this Request for Information have been transferred beyond the Company's control, describe the circumstances under which the document was destroyed or transferred and provide an exact citation to the subject document. In the event that documents containing the exact information do not exist, but documents do exist which contain portions of the required information or which contain substantially similar information, then the definition of "documents" shall include the documents which do exist and these documents will be provided.

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**COMMISSION STAFF'S FIRST REQUEST FOR INFORMATION
TO C WILLOW WATER COMPANY
QUESTION NOS. STAFF 1-1 THROUGH STAFF 1-10**

INSTRUCTIONS

- 1) Pursuant to 16 TAC § 22.144(c)(2), Staff requests that answers to the requests for information be made under oath.
- 2) Please copy the question immediately above the answer to each question. State the name of the witness in this cause who will sponsor the answer to the question and can vouch for the truth of the answer.
- 3) These questions are continuing in nature, and if there is a relevant change in circumstances, submit an amended answer, under oath, as a supplement to your original answer.
- 4) Words used in the plural shall also be taken to mean and include the singular. Words used in the singular shall also be taken to mean and include the plural.
- 5) The present tense shall be construed to include the past tense, and the past tense shall be construed to include the present tense.
- 6) If any document is withheld under any claim of privilege, please furnish a list identifying each document for which a privilege is claimed, together with the following information: date, sender, recipients or copies, subject matter of the document, and the basis upon which such privilege is claimed.
- 7) Pursuant to 16 TAC § 22.144(h)(4), if the response to any request is voluminous, please provide a detailed index of the voluminous material.
- 8) Staff requests that each item of information be made available as it is completed, rather than upon completion of all information requested.

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**COMMISSION STAFF'S FIRST REQUEST FOR INFORMATION
TO C WILLOW WATER COMPANY
QUESTION NOS. STAFF 1-1 THROUGH STAFF 1-10**

- Staff 1-1** Please provide the date C-Willow received Michael Moore's completed application for water service.
- Staff 1-2** Please provide a copy of Mr. Moore's water service application.
- Staff 1-3** Please provide the date C-Willow initiated water service to the property listed in Mr. Moore's water service application.
- Staff 1-4** Please explain how C-Willow obtains water meter readings.
- Staff 1-5** As it relates to the water meter located on the property listed in Mr. Moore's water service application, please provide the following information:
- a. the results of C-Willow's initial water meter reading and the date the water meter reading occurred; and
 - b. the results of C-Willow's second water meter reading and the date the water meter reading occurred.
- Staff 1-6** Please provide the water meter read log(s), and any other documentation, supporting the dates and results identified in Staff 1-5.
- Staff 1-7** As it relates to the water meter of the subject property while it was assigned to Keith Johanson, the home builder, please provide the following information as it relates to water usage for the period between August 1, 2018 to October 1, 2018:
- a. the results of C-Willow's water meter readings and the dates the water meter readings occurred; and
 - b. all meter read logs, and any other documentation, supporting the dates and water meter readings identified in Staff 1-7(a).
- Staff 1-8** Please provide a copy of all invoices C-Willow has issued for Mr. Moore's water service account.
- Staff 1-9** Have any late fees been assessed by C-Willow to Mr. Moore's account? If so, please provide the following information:
- a. the date any late fee was assessed;
 - b. the corresponding amount of each late fee assessed;
 - c. the reason each identified late fee was assessed.

- Staff 1-10** As it relates to any adjustments C-Willow made to Mr. Moore's water service account prior to September 14, 2018, please provide the following information:
- a. identify the content of each individual adjustment; and
 - b. explain the reason for making each such adjustment identified in Staff 1-10(a).