



Control Number: 50367



Item Number: 10

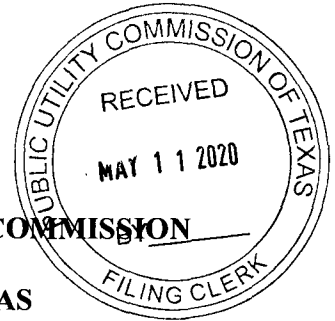
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DOCKET NO. 50367

**COMPLAINT OF CHAD SWAHN
AGAINST SHADY OAKS WATER
SUPPLY COMPANY, LLC**

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**PUBLIC UTILITY COMMISSION
OF TEXAS**



**COMMISSION STAFF'S FIRST REQUEST FOR INFORMATION
TO HICKORY HILL WATER SUPPLY COMPANY
QUESTION NOS. STAFF 1-1 THROUGH STAFF 1-15**

Pursuant to 16 Texas Administrative Code (TAC) § 22.144 of the Commission's Procedural Rules, the Staff of the Public Utility Commission of Texas (Staff) requests Hickory Hill Water Supply 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 electronic copies in accordance with Commission Order Suspending Rules in Project No. 50664. For further information, please review information provided on the Public Utility Commission of Texas website regarding electronic filing.

Dated: May 11, 2020

Respectfully submitted,

**PUBLIC UTILITY COMMISSION OF TEXAS
LEGAL DIVISION**

Rachelle Nicolette Robles
Division Director

Heath D. Armstrong
Managing Attorney

/s/ Robert Dakota Parish
Robert Dakota Parish
State Bar No. 24116875
1701 N. Congress Avenue
P.O. Box 13326
Austin, Texas 78711-3326
(512) 936-7442
(512) 936-7268 (facsimile)
Robert.Parish@puc.texas.gov

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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 May 11, 2020, in accordance with the Order Suspending Rules, issued in Project No. 50664.

/s/ Robert Dakota Parish
Robert Dakota Parish

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**COMMISSION STAFF'S FIRST REQUEST FOR INFORMATION
TO HICKORY HILL WATER SUPPLY COMPANY
QUESTION NOS. STAFF 1-1 THROUGH STAFF 1-15**

DEFINITIONS

- 1) "Applicants," or "you" refers to Hickory Hills Water Supply Company, Shady Oaks Water Supply Company, LLC, 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.
- 2) "Swahn" or "Mr. Swahn" refers to Chad Swahn who resides at 327 Hickory Hill Drive Lot #7, La Vernia, Texas, and any person acting or purporting to act on their behalf, including without limitation, attorneys, agents, advisors, investigators, representatives, employees or other persons.
- 3) "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 HICKORY HILL WATER SUPPLY COMPANY
QUESTION NOS. STAFF 1-1 THROUGH STAFF 1-15**

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 HICKORY HILL WATER SUPPLY COMPANY
QUESTION NOS. STAFF 1-1 THROUGH STAFF 1-15**

- Staff 1-1** Please provide all documentation of the requests for water service Hickory Hill Water Supply Company (Hickory Hill) received for 327 Hickory Hill Drive Lot #7, La Vernia, Texas between July 27, 2018 through April 25, 2019.
- Staff 1-2** Please provide the date that the previous water customer of record at 327 Hickory Hill Drive Lot #7, La Vernia, before Mr. Swahn requested that service with Hickory Hill be terminated and the date Hickory Hill completed the order for disconnection.
- Staff 1-3** Please provide the maximum security deposit amount allowed under Hickory Hill's tariff.
- Staff 1-4** Please provide a narrative describing the reason Hickory Hill billed Mr. Swahn a \$100 security deposit.
- Staff 1-5** Please explain if water service was already connected and turned on at 327 Hickory Hill Drive Lot #7, La Vernia, Texas when Hickory Hill received Mr. Swahn's application for service.
- Staff 1-6** Please provide the date Hickory Hill received Mr. Swahn's application for service.
- Staff 1-7** Please provide the date(s) Hickory Hill processed and accepted Mr. Swahn's application for service.
- Staff 1-8** Please provide a copy of the disconnect notice that resulted in the September 2019 disconnection in service at 327 Hickory Hill Drive Lot #7, La Vernia, Texas.
- Staff 1-9** Please explain why Hickory Hill locked the meter on September 18, 2019 as indicated in Hickory Hill's response to Order No. 1, and not prior to that date. Was the disconnection in compliance with Hickory Hill's tariff? Please explain.
- Staff 1-10** Please provide the current status of Mr. Swahn's account.
- Staff 1-11** Reference the document labeled Customer History 07/27/2018 to 09/18/ 2019. Please explain why Hickory Hill added charges for water service to Mr. Swahn's account from July 27, 2018 through April 11, 2019.
- Staff 1-12** Please provide Hickory Hill's policy for initiating service at rental properties.
- Staff 1-13** Please provide a copy of the police report that Hickory Hill filed for meter tampering or theft of service for 327 Hickory Hill Drive Lot #7, La Vernia, Texas.

Staff 1-14 Reference the document labeled Customer History 07/27/2018 to 09/18/2019. Please explain the \$450 meter charge assessed to Mr. Swahn's account on July 27, 2018. Provide a copy of the tariff which includes such charges.

Staff 1-15 Please provide a copy of all invoices Hickory Hill has issued to Mr. Swahn for water services and related fees.