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**OAH DOCKET NO. 473-20-4071.WS
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RATEPAYERS APPEAL OF THE	§	BEFORE THE STATE OFFICE
DECISION BY WINDERMERE OAKS	§	
WATER SUPPLY CORPORATION TO	§	OF
CHANGE WATER AND SEWER	§	
RATES	§	ADMINISTRATIVE HEARINGS

**WINDERMERE OAKS WATER SUPPLY CORPORATION SUPPLEMENTAL
RESPONSE TO RATEPAYERS' AMENDED SIXTH REQUEST FOR INFORMATION**

Windermere Oaks Water Supply Corporation (WOWSC) files this Supplemental Response to the Amended Sixth Request for Information (RFI) filed by Ratepayers. The discovery request was received by WOWSC after the filing deadline on January 20, 2023; therefore, these responses are timely filed. Pursuant to 16 Tex. Admin. Code (TAC) § 22.144(c)(2)(F), these responses may be treated as if they were filed under oath.

WOWSC files this Supplemental Response to Ratepayers' Amended RFI Nos. 6-14, 6-15, 6-16, 6-17, and 6-20. Based on an agreement between WOWSC and Ratepayers counsel, Windermere Oaks agrees to supplement its original response.

The following files are confidential and will be provided electronically in a subsequent filing:

Voluminous Supplemental CONFIDENTIAL Attachment Ratepayers Amended 6-14 – Legal Invoices

Supplemental CONFIDENTIAL Attachment Ratepayers Amended 6-15 – Legal Service Payments

Supplemental CONFIDENTIAL Attachment Ratepayers Amended 6-20 – Legal Reminder Statements/Statements of Account.

Respectfully submitted,

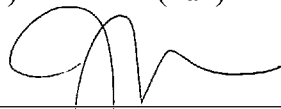
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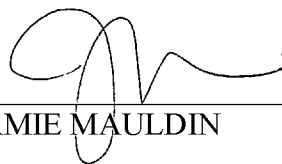
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**ATTORNEYS FOR WINDERMERE OAKS
WATER SUPPLY CORPORATION**

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 February 23, 2023, in accordance with the Order Suspending Rules, issued in Project No. 50664.



JAMIE MAULDIN

SOAH DOCKET NO. 473-20-4071.WS
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WOWSC’S SUPPLEMENTAL RESPONSE TO RATEPAYERS AMENDED SIXTH RFI

RATEPAYERS AMENDED 6-14: State the amount of each monthly invoice for outside legal services rendered during 2020, 2021, 2022 and 2023, respectively, and provide a copy of each invoice.

RESPONSE:

The amount of each monthly invoice for outside legal services rendered during 2020, 2021, 2022, and 2023, is found in each individual monthly invoice next to the “Total Fees” (Enoch Kever invoices), “Total” (Shidlofsky Law Firm invoices), and “Total This Invoice” (Lloyd Gosselink invoices) rows. See Voluminous Supplemental Confidential Attachment Ratepayers Amended 6-14.

WOWSC will supplement WOWSC’s Response to Ratepayers Amended 6-14 with 2023 legal invoices as the invoices become available.

Prepared by: Counsel
Sponsored by: Counsel

**Supplemental Attachment
Ratepayers Amended 6-14 is
Voluminous and CONFIDENTIAL
(being provided in subsequent filing)**

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WOWSC'S SUPPLEMENTAL RESPONSE TO RATEPAYERS AMENDED SIXTH RFI

RATEPAYERS AMENDED 6-15: State the date and amount of each payment for outside legal services rendered during 2020, 2021, 2022 and 2023, respectively, and provide a copy of the record of each payment.

RESPONSE: See Confidential Attachment Ratepayers Amended 6-15; Supplemental Confidential Attachment Ratepayers Amended 6-15.

WOWSC will continue to supplement WOWSC's Response to Ratepayers Amended 6-15 as additional records of outside legal service payments become available.

Prepared by: Counsel
Sponsored by: Counsel

**Supplemental Attachment Ratepayers
Amended 6-15 is CONFIDENTIAL
and is being provided in subsequent
filing**

SOAH DOCKET NO. 473-20-4071.WS
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WOWSC'S SUPPLEMENTAL RESPONSE TO RATEPAYERS AMENDED SIXTH RFI

RATEPAYERS AMENDED 6-16: State whether Windermere had paid in full as of December 31, 2020, all outside legal costs for which it had received invoices as of December 31, 2020, and, if applicable, state the unpaid balance owed as of that date.

For clarity, this RFI inquires about all invoices received as of December 31, 2020, including invoices received during 2019.

RESPONSE:

As of December 31, 2020, WOWSC had not paid its outside legal costs in full. The total unpaid balance at this time was \$408,320.79. The total cost is the sum of the "Total Amount Due" amounts found in the attached Reminder Statements. See Confidential Attachment Ratepayers Amended 6-16.

Note: For the Lloyd Gosselink "General Counsel" invoice found at Confidential Attachment Ratepayers Amended 6-16 at 3, the last payment of \$19,268.46 that Lloyd Gosselink received on January 6, 2021, was added to "Total Amount Due" figure of \$82,705.14 to accurately reflect what WOWSC owed Lloyd Gosselink on December 31, 2020.

Prepared by: Counsel
Sponsored by: Counsel

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WOWSC'S SUPPLEMENTAL RESPONSE TO RATEPAYERS AMENDED SIXTH RFI

RATEPAYERS AMENDED 6-17: State whether Windermere had paid in full as of December 31, 2021, all outside legal costs for which it had received invoices as of December 31, 2021, and, if applicable, state the unpaid balance owed as of that date.

For clarity, this RFI inquires about all invoices received as of December 31, 2021, including invoices received during 2019 or 2020.

RESPONSE:

As of December 31, 2021, WOWSC had not paid its outside legal costs in full. The total unpaid balance at this time was \$670,458.79. The total cost is the sum of the "Total Amount Due" amounts found in the attached Reminder Statements. See Confidential Attachment Ratepayers Amended 6-17.

Note: For the Lloyd Gosselink "TOMA Integrity Litigation" Reminder Statement found at Confidential Attachment Ratepayers Amended at 5, the highlighted invoice balances from the December 22, 2020, invoice through the December 3, 2021, invoice were totaled to calculate total outstanding legal fees in this particular matter on December 31, 2021.

Prepared by: Counsel
Sponsored by: Counsel

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WOWSC’S SUPPLEMENTAL RESPONSE TO RATEPAYERS AMENDED SIXTH RFI

RATEPAYERS AMENDED 6-20: State the unpaid balance owed to each of the following law firms at month-end for each month during 2020, 2021, 2022 (beginning with August 2022) and 2023: Lloyd Gosselink, Enoch Kever and Shidlofsky Law Firm.

RESPONSE:

For Lloyd Gosselink unpaid balances, see WOWSC Response to Ratepayers Amended 6-20. Monthly unpaid balances are listed in the referenced Reminder Statements.

Enoch Kever month-end unpaid balances are provided in a table attached as Supplemental Confidential Attachment Ratepayers Amended 6-20a.

Shidlofsky Law Firm unpaid balances are provided as Supplemental Confidential Attachment Ratepayers Amended 6-20b. The Shidlofsky Law Firm utilized its computer software to produce each month’s outstanding balance. The outstanding balance at the end of each month is the last figure under the “Balance” cell on each month’s “Ledger Entries” page.

Prepared by: Counsel
Sponsored by: Counsel

**Supplemental Attachment Ratepayers
Amended 6-20 is CONFIDENTIAL
and is being provided in subsequent
filing**