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**SOAH DOCKET NO. 473-20-4071.WS
PUC DOCKET NO. 50788**

RATEPAYERS APPEAL OF THE	§	BEFORE THE STATE OFFICE
DECISION BY WINDERMERE OAKS	§	
WATER SUPPLY CORPORATION TO	§	OF
CHANGE WATER AND SEWER	§	
RATES	§	ADMINISTRATIVE HEARINGS

**RATEPAYER REPRESENTATIVES' NINTH REQUEST FOR INFORMATION
TO WINDERMERE OAKS WATER SUPPLY CORPORATION**

THE REPRESENTATIVES OF THE RATEPAYERS OF WINDERMERE OAKS WATER SUPPLY CORPORATION (“Ratepayers”) serve this Ninth Request for Information (“RFI”) on Windermere Oaks Water Supply Corporation (“Windermere” or “WOWSC”) pursuant to 16 TAC §22.144. Ratepayers’ RFIs are set forth on the attachment hereto, which is incorporated herein. Pursuant to SOAH Order No. 23, Windermere’s responses are due 10 business days after receipt of this Request. In all other respects, Windermere’s responses must comply with §22.144(c). Windermere has a continuing duty to supplement its responses as required by §22.144(i).

Respectfully Submitted,

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Certificate of Service

I hereby certify that, unless otherwise ordered by the Presiding Officer, notice of this filing was provided to all parties of record via electronic mail on February 24, 2023.

/s/ Kathryn E. Allen
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**RATEPAYERS NINTH REQUEST FOR INFORMATION
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Definitions and Instructions

1. “Windermere” refers to Windemere Oaks Water Supply and Sewer Corporation, and its affiliates, subsidiaries, and any person acting or purporting to act on their behalf, including without limitation, attorneys, agents, advisors, investigators, representatives, employees or other persons.

2. “Document.” The term “document” or “documents” as used herein shall be defined in the broadest sense and shall include any non-identical copies (whether different from the originals because of notes made on such copies or otherwise), of writings of every kind and description, whether inscribed or stored by hand, mechanical, electronic, microfilm, photographic, or other means, including, but not limited to, phonic (such as tape recordings) or visual reproduction of oral statements, conversations or events, and including, but not limited to, correspondence, transcripts, statements, teletype messages, electronic mail (e-mail or email), instant messages, text messages, blackberry or palm pilot messages, internal memoranda, notes, transcriptions, reports (including drafts, preliminary, intermediate and final reports), contracts, agreements, surveys, comparisons, charts, books, pamphlets, bulletins, records, accounts, checks, receipts, bills, minutes, calendar and diary entries, appointment books, time sheets, log sheets, ledgers, compilations, studies, tabulations, tallies, maps, diagrams, drawings, papers, plans, pictures, computer runs, summaries of computer runs, and any translations of any of the foregoing. The term “document” includes all electronically produced, generated, or stored records (including deleted information), including, but not limited to, computer disks (including floppy diskettes, zip disks, CD-ROMs, and hard drives), word processing files, website postings, PDF or tif files, slides, graphic material, tapes, computer databases and other data compilations, spreadsheets, schedules, and for all and each of the foregoing, including all non-identical copies, back-ups, or archival versions of same, whether located on-site or off-site. Designated documents shall be taken to include all attachments and enclosures.

3. Specific Request for Production of Electronically Stored Data and Information. The term “document” includes, and this Request seeks discovery of, data and information that exists or ever existed in electronic or magnetic form, including deleted material. Ratepayers request production of such data and information as follows:

a. Production Format for Electronically Stored Information (ESI). Production of all ESI not specifically addressed below is requested in native file format. Before being produced, all parent-level email and loose-file (non-email) ESI should be de-duplicated across all custodians and shared network drives based on MD5 hash value. Individual email attachments should not be separately de-duplicated. All ESI should be produced with a metadata field listing

all custodians where duplicate documents were found. All ESI documents with any text content should be produced with full extracted text in a corresponding TXT file.

b. Production of Email. Email should be produced in native format as individual, parent level, HTML files, and attachments to emails should sequentially follow their parent emails and be produced in native format as separate files. If any email cannot be produced in native format, such email should be produced in searchable image format, parent emails and their attachments should be produced as separate, contiguous documents. All email metadata should be processed in the Central time zone, and all metadata fields for date sent, time sent, date received, and time received should be converted to the same time zone.

c. Production of Excel™ Spreadsheets. Excel™ spreadsheets should be produced in native format if stored in that manner, and each native file should be named with a document production number as described below. If a spreadsheet contains privileged information, you may produce it as imaged ESI, with the privileged information redacted, provided that you make reasonable efforts in applying page layout settings to maximize document readability. Images of spreadsheets that contain multiple worksheets should be produced with worksheet names indicated in a header or footer. To the extent that print-outs or images of all or part of a spreadsheet were also maintained in the ordinary course of business in static form (e.g., as a pdf attachment), those documents should be produced as images.

d. Production of Database Information. Relevant information from a database should be produced as a report or data table, either in a static image format or in a popular database application, such as an Access™ database.

e. Production of ESI Commentary and Tracked Changes. Microsoft Word, Microsoft Excel, and similar file formats that provide for comments or tracked changes should be produced in a manner in which all comments and tracked changes are preserved, accessible, and viewable in their original color format. Such production may be in native format.

4. 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.

5. Privilege. For each document or item of information withheld under a claim of privilege, Windermere is requested to provide a description that includes the date, the identity of the originator, the identity of all parties to whom the document or item was circulated, the subject matter, the privilege claimed and the basis upon which such privilege is claimed.

6. Pursuant to 16 TAC § 22.144(c)(2), answers to the requests for information must be made under oath.

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**RATEPAYERS' NINTH REQUEST FOR INFORMATION
TO WINDERMERE OAKS WATER SUPPLY CORPORATION
QUESTIONS 9-1 TO 9-2**

RATEPAYERS' 9-1:

Reference Mike Nelson Supplemental Rebuttal Testimony, p. 8, line 5 – p. 11, line 2. Please produce all appraisals and other opinions of value that were prepared on or after January 1, 2018 and concern one or more of the properties listed below:

BCAD Prop. ID	Parcel Size
45556	0.2299
45557	0.2646
45575	0.4004
45779	0.1286
56117	0.266 ac.
56136	24 ac.
56161	4.027 ac.
62330	2.9857 ac.
65687	35.954 ac.

RATEPAYERS' 9-2:

Reference Mike Nelson Supplemental Rebuttal Testimony, p. 8, line 5 – p. 11, line 2. Please identify all real property interests (exclusive of the ownership interests identified in Ratepayers' 9-1) owned by Windermere as of January 1, 2018 and produce all appraisals and other opinions of value that were prepared on or after January 1, 2018 and concern one or more of the properties so identified.