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

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

**WINDERMERE OAKS WATER SUPPLY CORPORATION'S SUPPLEMENTAL
RESPONSE TO RATEPAYERS FIRST REQUEST FOR INFORMATION**

Windermere Oaks Water Supply Corporation (WOWSC) files this Supplemental Response to the Ratepayers of Windermere Oaks Water Supply (Ratepayers) First Request for Information (RFI) filed on August 26, 2020. WOWSC supplements its Response pursuant to 16 Tex. Admin. Code (TAC) § 22.144(i). Pursuant to 16 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 RFI 1-9. WOWSC initially objected to this RFI on grounds of attorney client and work product privilege.¹ Ratepayers filed a Motion to Compel on September 15, 2020.² On October 8, 2020, the Administrative Law Judge referred this proceeding and this discovery dispute to mediation.³ The proceeding and pending discovery disputes were not resolved at mediation and the matter has been referred back to the State Office of Administrative Hearings (SOAH) for litigation.

On January 21, 2021, the WOWSC Board voted to release the unredacted legal invoices at issue in this RFI. Therefore, WOWSC waives its pending objections related to this RFI and files this Supplemental Response.

At the time of this filing, WOWSC has not yet released the unredacted invoices to the public but is working to release them in the coming days. Therefore, WOWSC provides the responsive documents under seal, pursuant to the protective order.

¹ WOWSC Objections to Ratepayers' First Request for Information at 7-15 (Sept 8, 2020).

² WOWSC Ratepayers' Motion to Compel (Sept 15, 2020).

³ SOAH Order No. 5 Granting in Part Motion to Compel, Denying Motion to Abate, and Referring to Mediation (Oct 8, 2020).

The following files are confidential and will be provided electronically on the CD attached to this filing:

CONFIDENTIAL Attachment Ratepayers 1-9.

If a responsive document exceeds 99 pages, the response will indicate that the attachment is voluminous, and pursuant to 16 TAC §§ 22.144(h)(2), the document will be provided electronically on the CD attached to this filing and made available for inspection at the offices of WOWSC's attorneys, Lloyd Gosselink Rochelle and Townsend, P.C., located at 816 Congress Avenue, Suite 1900, Austin, Texas 78701. Please call Hanna Campbell at (512) 322-5871 during regular business hours, to make an appointment to review the documents.

Pursuant to 16 TAC § 22.144(h)(4), an index of the voluminous documents is provided, below.

VOLUMINOUS INDEX

1. Voluminous Attachments to WOWSC's Response to Ratepayers' First RFI

No.	Date	Title or Description	Preparer or Sponsor	Page Range	No. of Pages
1-9	January 28, 2021	Unredacted Legal Invoices	Preparer: Joe Gimenez Sponsor: Joe Gimenez	1-121	121

Respectfully submitted,

**LLOYD GOSSELINK ROCHELLE
& TOWNSEND, P.C.**

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**ATTORNEYS FOR WINDERMERE OAKS
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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 January 28, 2021, in accordance with the Order Suspending Rules, issued in Project No. 50664.



JAMIE L. MAULDIN

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WINDERMERE OAKS WATER SUPPLY CORPORATION'S
SUPPLEMENTAL RESPONSE TO RATEPAYERS'
FIRST REQUEST FOR INFORMATION

Ratepayers 1-9 Please provide all unredacted attorney invoices for the years 2018 and 2019.

RESPONSE: Please see voluminous *CONFIDENTIAL* Attachment Ratepayers 1-9, being provided on CD, for responsive documents.

Prepared by: Joe Gimenez
Sponsored by: Joe Gimenez