



## Filing Receipt

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**COMPLAINT OF JOHN BLALOCK  
AGAINST MERCY WATER SUPPLY  
CORPORATION**

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**PUBLIC UTILITY COMMISSION  
OF TEXAS**

**DIRECT TESTIMONY**

**OF**

**KELLEY ALLBRIGHT**

**ON BEHALF OF MERCY WATER SUPPLY CORPORATION**

**AUGUST 5, 2021**

**PUC DOCKET NO. 51224**

**DIRECT TESTIMONY OF KELLEY ALLBRIGHT, WITNESS FOR  
MERCY WATER SUPPLY CORPORATION**

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**DIRECT TESTIMONY OF  
KELLEY ALLBRIGHT,  
WITNESS FOR MERCY WATER SUPPLY CORPORATION**

**I. INTRODUCTION**

**Q. PLEASE STATE YOUR NAME AND OCCUPATION.**

A. My name is Kelley Allbright. I am the Office Manager of Mercy Water Supply Corporation ("Mercy").

**Q. ON WHOSE BEHALF ARE YOU TESTIFYING IN THIS PROCEEDING?**

A. I am filing direct testimony on behalf of Mercy. John Blalock filed a complaint against Mercy to the Public Utility Commission of Texas ("PUC") in this case.

**II. PURPOSE OF TESTIMONY**

**Q. WHAT IS THE PURPOSE OF YOUR TESTIMONY?**

A. I will present testimony that John Blalock is not a member of Mercy and is not entitled to water service from Mercy for that reason.

**Q. HOW MUCH TIME HAVE YOU SPENT WORKING ON THIS CASE?**

A. Almost 12 months.

**Q. HOW LONG HAVE YOU BEEN EMPLOYED IN YOUR CURRENT POSITION?**

A. I began working with Mercy on March 4, 2004 as a receptionist. In 2018, I became Office Manager.

**Q. WHAT DO YOUR JOB RESPONSIBILITIES ENTAIL?**

A. I am responsible for preparing the bill notices for Mercy's customers and mailing them out on or before the last working day of the month. I also prepare the report with past due

1 accounts and mail out the late and disconnect notices attached to those customer bills at  
2 the beginning of every month.

3 **Q. IS JOHN BLALOCK A MEMBER OF MERCY?**

4 A. No.

5 **Q. WHAT ARE THE REQUIREMENTS TO BECOMING A MEMBER OF MERCY?**

6 A. Mercy's tariff states that someone is considered qualified and entitled to water utility  
7 service when "proper application has been made, terms and conditions of Service and  
8 Membership have been met and continue to be met, and all fees have been paid as  
9 prescribed." The initial step to obtain a membership and water service is for an applicant  
10 to Mercy to complete and sign Mercy Application Form.

11 **Q. HAS JOHN BLALOCK SUBMITTED AN APPLICATION TO BECOME A**  
12 **MEMBER OF MERCY?**

13 A. No.

14 **Q. HAS JOHN BLALOCK MET THE TERMS AND CONDITIONS OF SERVICE**  
15 **AND MEMBERSHIP FOR BECOMING A MEMBER OF MERCY?**

16 A. No, because has not applied for a new membership or transferred an existing membership  
17 to himself.

18 **Q. HAS JOHN BLALOCK PAID THE FEES TO BE A MEMBER OF MERCY?**

19 A. No. To become a new member, Mr. Blalock would be responsible for payment of a meter  
20 installation fee, a customer service inspection fee, a membership fee, equity Buy-in fee,  
21 and installation fee. If he had transferred Ms. Ivey's membership, he would have owed a  
22 transfer fee of \$20.

1   **Q.     WAS JOHN BLALOCK’S MOTHER, REBA IVEY, A MEMBER OF MERCY?**

2   Y.     Yes, she was.

3   **Q.     WHAT IS THE STATUS OF MS. IVEY’S MEMBERSHIP?**

4   A.     Mercy terminated Ms. Ivey’s membership on August 7, 2020 for nonpayment. Ms. Ivey  
5           had passed away on January 21, 2015, but Mercy was not aware of her passing and her  
6           account was being paid, so it was not until Mercy learned that Ms. Ivey was no longer fee  
7           simple owner of the property associated with her account that her account was terminated.

8   **Q.     WHAT HAPPENS TO A MEMBER’S MEMBERSHIP WITH MERCY WHEN**  
9       **THEY DIE?**

10  A.     Upon the death of a member, their membership in Mercy ceases, and their water service  
11          will be discontinued automatically 30 days after Mercy becomes aware of their death.

12  **Q.     DOES MERCY’S TARIFF ALLOW A MEMBERSHIP TO AUTOMATICALLY**  
13       **BE PASSED DOWN TO A FAMILY MEMBER WHEN THE FAMILY MEMBER**  
14       **WHO WAS A MEMBER DIES?**

15  A.     No. Mercy’s Tariff allows for transfer of membership after death if either the membership  
16          is transferred by will to a person related to the transferor within the second degree by  
17          consanguinity or the Membership is transferred without compensation to a person related  
18          to the Transferor within the second degree by consanguinity, but not automatically. The  
19          membership will be transferred only if the transferee completes a Membership Transfer  
20          Authorization Form, complete the Application Packet, pays any indebtedness due Mercy,  
21          and has been paid; and demonstrates satisfactory evidence of ownership of the property  
22          from which the Membership originally arose.

1   **Q.    WHY WAS WATER SERVICE TO BLALOCK’S RESIDENCE DISCONTINUED**  
2       **AFTER MS. IVEY DIED?**

3   A.    Because we discovered that she was no longer the owner of the property from which the  
4       Membership originally arose her membership was never transferred to anyone.

5   **Q.    WHO WAS THE OFFICE MANAGER FOR MERCY BEFORE YOU?**

6   A.    Lenora Walker.

7   **Q.    DO YOU KNOW LENORA WALKER?**

8   A.    Yes, she is my mother.

9   **Q.    TO YOUR KNOWLEDGE, HAS ANY OFFICER OR EMPLOYEE AT MERCY**  
10       **EVER TOLD JOHN BLAOCK THAT HE WAS NOT REQUIRED TO FULFILL**  
11       **MERCY’S MEMBERSHIP REQUIREMENTS TO CONTINUE RECEIVING**  
12       **WATER SERVICE?**

13   A.    Not to my knowledge. No one has ever told Mr. Blalock that he could continue to receive  
14       water service from Mercy through Ms. Ivey’s membership without completing the  
15       requirements for membership or transfer described above.

16   **Q.    WHY DID MERCY OPPOSE MEDIATION IN THIS CASE?**

17   A.    Mercy does not believe that Mr. Blalock would mediate in good faith, as he continues to  
18       insist that he is entitled to services that he is not entitled to.

19   **Q.    DOES THIS CONCLUDE YOUR DIRECT TESTIMONY?**

20   A.    It does.