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Received - 2021-08-05 12:39:59 PM

Control Number - 51224

ItemNumber - 105

DOCKET NO. 51224

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

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**PUBLIC UTILITY COMMISSION
OF TEXAS**

DIRECT TESTIMONY

OF

RANDALL BAKER

ON BEHALF OF MERCY WATER SUPPLY CORPORATION

AUGUST 5, 2021

PUC DOCKET NO. 51224

**DIRECT TESTIMONY OF RANDALL BAKER, WITNESS FOR
MERCY WATER SUPPLY CORPORATION**

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RANDALL BAKER,
WITNESS FOR MERCY WATER SUPPLY CORPORATION**

I. INTRODUCTION

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Q. PLEASE STATE YOUR NAME AND OCCUPATION.

A. My name is Randall Baker. I am a contractor who works with Mercy Water Supply Corporation (“Mercy”) to install water meters.

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 regarding Mercy’s cessation of water service to his residence.

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 LONG HAVE YOU BEEN EMPLOYED IN YOUR CURRENT POSITION?

A. I began working as a contractor for Mercy, installing water meters for Mercy’s customers, at or around 1993.

Q. ARE YOU FAMILIAR WITH THE PROPERTIES THAT HAVE BEEN REFERRED TO IN THIS PROCEEDING AS THE “NORTHERN TRACT” AND THE “SOUTHERN TRACT”?

1 A. Yes. The “Northern Tract” refers to 1611 Bowen Loop, Cleveland, TX 77328. The
2 “Southern Tract” refers to 1601 Bowen Loop, Cleveland, TX 77328.

3 **Q. HAVE YOU INSTALLED METERS AT EITHER TRACT FOR WATER SERVICE**
4 **FROM MERCY?**

5 A. Only for the Southern Tract. There is no meter at the Northern Tract.

6 **Q. PLEASE DESCRIBE THE INSTALLATION YOU MADE AT THE SOUTHERN**
7 **TRACT.**

8 A. Of course. I installed a meter on the Southern Tract where Mercy’s existing water line
9 crosses Bowen Loop adjacent to the Southern Tract. The meter has not been moved since
10 its installation.

11 **Q. WHEN DID YOU INSTALL THE METER ON THE SOUTHERN TRACT?**

12 A. In August 1995.

13 **Q. WAS THE METER YOU INSTALLED ON THE SOUTHERN TRACT MEANT TO**
14 **PROVIDE SERVICE TO THE NORTHERN TRACT?**

15 A. No.

16 **Q. HAS THERE EVER BEEN A MERCY WATER METER INSTALLED ON THE**
17 **NORTHERN TRACT?**

18 A. No.

19 **Q. HOW WAS THE NORTHERN TRACT ABLE TO RECEIVE WATER SERVICE**
20 **FROM MERCY UNTIL AUGUST 2020 WITHOUT HAVING A METER**
21 **INSTALLED?**

22 A. Someone ran a private water line crossing the Southern Tract to the Northern Tract’s house
23 without obtaining any easement for the Northern Tract’s use of that line.

1 **Q. ARE YOU FAMILIAR WITH MERCY'S MEMBERSHIP REQUIREMENTS?**

2 A. Yes.

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

4 A. To become a member, an applicant must complete and sign Mercy Application Form, show
5 proof of ownership of the property to be provided with water service, and pay the applicable
6 fees to have a meter connected to the property.

7 **Q. BASED ON WHAT YOU KNOW ABOUT THE NORTHERN TRACT, IS JOHN
8 BLALOCK ENTITLED TO WATER SERVICE FROM MERCY?**

9 A. No, he is not, because there is no meter installed to service the Northern Tract., which is
10 the property he owns. He does not own the Southern Tract.

11 **Q. WHO WAS THE OFFICE MANAGER FOR MERCY BEFORE KELLEY
12 ALLBRIGHT?**

13 A. Lenora Walker.

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

15 A. Yes.

16 **Q. TO YOUR KNOWLEDGE, HAS ANY OFFICER OR EMPLOYEE AT MERCY
17 EVER TOLD JOHN BLAOCK THAT HE WAS NOT REQUIRED TO FULFILL
18 MERCY'S MEMBERSHIP REQUIREMENTS TO CONTINUE RECEIVING
19 WATER SERVICE?**

20 A. Not to my knowledge, no.

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

22 A. Yes, it does.