



## Filing Receipt

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DOCKET:

COMPLAINT OF JOHN

51224

BEFORE THE STATE

BLALOCK AGAINST

SOAH DOCKET:

OFFICE OF

MERCY WATER

473-21-1180.WS

ADMINISTRATIVE

SUPPLY

HEARINGS

CORPORATION

**REQUEST FOR INFORMATION FROM JOHN BLALOCK TO MERCY  
FOR KELLEY ALLBRIGHT**

**I.**

**DUTY TO SUPPLEMENT**

You have a duty to supplement any responses that are incomplete or incorrect when submitted. You have a duty to amend your responses within a reasonable time after you obtain information on the basis of which you know that a response either: (1) was incorrect or incomplete when submitted, or; (2) although correct and complete when submitted is no longer correct and complete, and the circumstances are such that failure to amend the response is, in substance, misleading.

**II.**

**REQUESTS FOR INFORMATION**

### **JOHN BLALOCK'S REQUEST TO KELLEY ALLBRIGHT 1-1**

As stated in Kelley Allbright's Direct Testimony, "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 accounts and mail out the late and disconnect notices attached to those customer bills at the beginning of every month." As your responsibilities do not cover canceling memberships, nor approving transfers, who is responsible, according to Mercy's tariff and written policies, for those actions? Please provide documentation supporting your answer.

### **JOHN BLALOCK'S REQUEST TO KELLEY ALLBRIGHT 1-2**

As stated in Kelley Allbright's Direct Testimony, "Mercy Terminated Ms. Ivey's membership on August 7, 2020 for nonpayment." Yet, no notices were ever mailed out about the pending termination, and in Kelley Allbright's affidavit it is stated, "I prepared and mailed out a disconnect notice to Ms. Reba Ivey for nonpayment." (1) As a copy of the mentioned notice would be part of Ms. Ivey's record, can you provide a copy of that notice and (2) are you saying Mercy did not follow their tariff in sending out notices for cancelation of Ms. Ivey's membership? Please provide documentation to support your answer.

### **JOHN BLALOCK'S REQUEST TO KELLEY ALLBRIGHT 1-3**

As stated in Kelley Allbright's Direct testimony, "...Mercy was not aware of her passing...". (1) Is this to Mercy's knowledge or Kelley Allbright's knowledge; (2) were you present when Mr. Blalock informed Ms. Walker of Ms. Ivey's passing in January of 2015; (3) did Ms. Walker introduce you to Mr. Blalock as the individual set to become the new office manager for Mercy in the same interaction. Please provide documentation to support your answer.

#### **JOHN BLALOCK'S REQUEST TO KELLEY ALLBRIGHT 1-4**

As stated in Kelley Allbright's Direct Testimony, "Upon the death of a member, their membership in Mercy ceases and their water service will be discontinued automatically 30 days after Mercy becomes aware of their death." (1) When did Mercy become aware of Ms. Meek's Death; (2) Why did water service to the meter, under Ms. Meek's account, continue for about 4 years following her death in 1997. Please provide documentation to support your response.

#### **JOHN BLALOCK'S REQUEST TO KELLEY ALLBRIGHT 1-5**

As stated in Kelley Allbright's Direct Testimony, "Not to my knowledge...". Does that mean there are actions of other officers or employees of Mercy, both previous and current, that are/were outside of your knowledge, or is it possible due to the length of time you have forgotten the action.

#### **JOHN BLALOCK'S REQUEST TO KELLEY ALLBRIGHT 1-6**

As stated in Kelley Allbright's Direct Testimony, Kelley Allbright answered "No." to "Has John Blalock submitted an application to become a member of Mercy?". In any of the times that Mr. Blalock, or a member of his household, appeared at Mercy's office; (1) did any of Mercy's staff inform them of Mercy's tariff/policies; or (2) did any of Mercy's staff make the tariff known and available to them as required by Mercy's tariff. If so, please provide supporting documentation.

#### **JOHN BLALOCK'S REQUEST TO KELLEY ALLBRIGHT 1-7**

As stated in Kelley Allbright's Direct Testimony, "...her membership was never transferred to anyone." Yet, in Kelley Allbright's Affidavit it is stated, "...Mr. Rodz properly transferred Ms. Ivey's account to himself." Please clarify which act is the true course of events, as both cannot be true.

RESPECTFULLY SUBMITTED BY,

/s/ John Blalock