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**DOCKET NO. 51224**

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

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**PUBLIC UTILITY COMMISSION  
OF TEXAS**

**COMMISSION STAFF'S FIRST REQUEST FOR INFORMATION TO  
JOHN BLALOCK  
QUESTION NOS. STAFF 1-1 THROUGH 1-15**

Pursuant to 16 Texas Administrative Code (TAC) § 22.144 of the Commission's Procedural Rules, the Staff of the Public Utility Commission of Texas (Staff) requests that John Blalock (Mr. Blalock) by and through his attorney of record, provide the following information and answer the following question(s) under oath. The question(s) shall be answered in sufficient detail to fully present all of the relevant facts, within the time limit provided by the Presiding Officer or within 20 days, if the Presiding Officer has not provided a time limit. Please copy the question immediately above the answer to each question. These question(s) are continuing in nature, and if there is a relevant change in circumstances, submit an amended answer, under oath, as a supplement to your original answer. State the name of the witness in this cause who will sponsor the answer to the question and can vouch for the truth of the answer.

Provide responses to the Requests for Information by filing with the Commission solely through the Interchange on the Commission's website and provide notice, by email, to all other parties that the pleading or document has been filed with the Commission, unless otherwise ordered by the presiding officer pursuant to the Order Suspending Rules in Docket No. 50664.

Dated: November 16, 2020

Respectfully submitted,

**PUBLIC UTILITY COMMISSION OF TEXAS  
LEGAL DIVISION**

Rachelle Nicolette Robles  
Division Director

Heath D. Armstrong  
Managing Attorney

/s/ Justin C. Adkins

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**DOCKET NO. 51224  
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 November 16, 2020, in accordance with the Order Suspending Rules, issued in Project No. 50664.

/s/ Justin C. Adkins

Justin C. Adkins

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<b>COMPLAINT OF JOHN BLALOCK</b>	<b>§</b>	<b>PUBLIC UTILITY COMMISSION</b>
<b>AGAINST MERCY WATER SUPPLY</b>	<b>§</b>	
<b>CORPORATION</b>	<b>§</b>	<b>OF TEXAS</b>

**COMMISSION STAFF'S FIRST REQUEST FOR INFORMATION TO  
JOHN BLALOCK  
QUESTION NOS. STAFF 1-1 THROUGH 1-15**

**DEFINITIONS**

- 1) "Mr. Blalock" or "you" refers to John Blalock and any person acting or purporting to act on their behalf, including without limitation, attorneys, agents, advisors, investigators, representatives, employees or other persons.
- 2) "Northern Tract" refers to the property currently located at 1611 Bowen Loop Rd., Cleveland, TX 77328.
- 3) "Southern Tract" refers to the property currently located at 1601 Bowen Loop Rd., Cleveland, TX 77328.
- 4) "Document" includes any written, recorded, or graphic matter, however produced or reproduced, including but not limited to correspondence, telegrams, contracts, agreements, notes in any form, memoranda, diaries, voice recording tapes, microfilms, pictures, computer media, work papers, calendars, minutes of meetings or other writings or graphic matter, including copies containing marginal notes or variations of any of the foregoing, now or previously in your possession. In the event any documents requested by this Request for Information have been transferred beyond your control, describe the circumstances under which the document was destroyed or transferred and provide an exact citation to the subject document. In the event that documents containing the exact information do not exist, but documents do exist which contain portions of the required information or which contain substantially similar information, then the definition of "documents" shall include the documents which do exist and these documents will be provided.

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**COMMISSION STAFF'S FIRST REQUEST FOR INFORMATION TO  
JOHN BLALOCK  
QUESTION NOS. STAFF 1-1 THROUGH 1-15**

**INSTRUCTIONS**

- 1) Pursuant to 16 TAC § 22.144(c)(2), Staff requests that answers to the requests for information be made under oath.
- 2) Please copy the question immediately above the answer to each question. State the name of the witness in this cause who will sponsor the answer to the question and can vouch for the truth of the answer.
- 3) These questions are continuing in nature, and if there is a relevant change in circumstances, submit an amended answer, under oath, as a supplement to your original answer.
- 4) Words used in the plural shall also be taken to mean and include the singular. Words used in the singular shall also be taken to mean and include the plural.
- 5) The present tense shall be construed to include the past tense, and the past tense shall be construed to include the present tense.
- 6) If any document is withheld under any claim of privilege, please furnish a list identifying each document for which a privilege is claimed, together with the following information: date, sender, recipients or copies, subject matter of the document, and the basis upon which such privilege is claimed.
- 7) 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.
- 8) Staff requests that each item of information be made available as it is completed, rather than upon completion of all information requested.

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**COMMISSION STAFF'S FIRST REQUEST FOR INFORMATION TO  
JOHN BLALOCK  
QUESTION NOS. STAFF 1-1 THROUGH 1-15**

- Staff 1-1** Please provide a copy of Ms. Reba Ivey's death certificate. If a death certificate is not available, please provide the day, month, and year of her death.
- Staff 1-2** Admit or deny that Ms. Ivey's estate was probated. If the estate was probated, please provide the name of the county in which it was probated.
- Staff 1-3** Please provide all estate planning and probate documents relating to Ms. Ivey's estate, including, but not limited to, Ms. Ivey's Last Will and Testament, trust documents, and all associated court orders.
- Staff 1-4** Please provide all documents proving that the address of the Northern Tract was officially changed, and when it was changed, from 154 Bowen Rd., Cleveland, TX, as reflected on the August 11, 1995 Service Application and Agreement completed by Ms. Ivey, to 1611 Bowen Loop, Cleveland, Texas 77328.
- Staff 1-5** Please provide all dates you have lived on the Northern Tract for the period of 1995 to present.
- Staff 1-6** Please provide a list of all non-water usage fees you have paid to Mercy Water Supply Corporation (Mercy WSC), including, but not limited to, an Equity Buy-In fee, Indication of Interest fee, Installation fee, Membership fee, Reconnection fee/costs, Service Trip fee, Tap fee, or Transfer fee; please provide the date each was paid.
- Staff 1-7** Please state whether you have ever provided proof of your ownership to the Northern Tract to Mercy WSC. If so, please state the form of this proof of ownership presented – *e.g.* warranty deed, deed of trust, or other recordable documentation of title – and state the date such proof of ownership was provided.
- Staff 1-8** Please provide all dates you have appeared in person at the Mercy WSC office and inquired into the transfer of Ms. Ivey's Mercy WSC membership to yourself during the period of January 1, 2020 to the present. Please provide the names of all individuals you have spoken to in person during such visits.
- Staff 1-9** Please provide all documentation you contend supports the position that you sought to transfer Ms. Ivey's Mercy WSC membership to yourself.
- Staff 1-10** Admit or deny that you completed and submitted to Mercy WSC a Service Application and Agreement to acquire water service and/or transfer Ms. Ivey's

Mercy WSC account to yourself. If so, please provide the date it was submitted to Mercy.

- Staff 1-11** Please provide a copy of all documents you have received from Mercy WSC reflecting any inquiry, and the results of such inquiry, you made into transferring Ms. Ivey's Mercy WSC account to yourself.
- Staff 1-12** Please provide a copy of all Disconnection or Cancellation Notices you have received from Mercy WSC.
- Staff 1-13** Admit or deny that you never followed the Grievance Procedures outlined in Mercy WSC's tariff relating to the voicing of concerns or grievances to Mercy WSC. If the answer is deny, please specify in detail any actions you took in accordance with the Grievance Procedures.
- Staff 1-14** Please provide the date, in the most exact form possible (day/month/year), the first pipeline transferring water from the meter on the Southern Tract to the Northern Tract, was installed. Please provide the name of all persons involved in the installation of such pipeline.
- Staff 1-15** Please provide all dates that the Northern Tract was provided water service by means of well(s).