



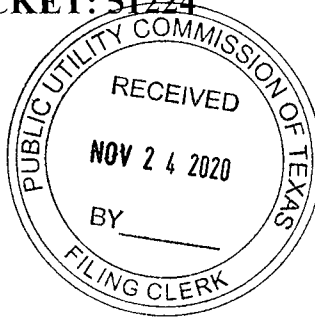
Control Number: 51224



Item Number: 34

Addendum StartPage: 0

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



**PUBLIC UTILITY  
COMMISSION OF  
TEXAS**

**JOHN BLALOCK'S SECOND REQUEST FOR INFORMATION TO  
MERCY WATER SUPPLY CORPORATION**

**INSTRUCTIONS**

1. Pursuant to 16 TAC § 22.144(c)(2), Mr. Blalock requests that answers to the request(s)/question(s) be made under oath.
2. Copy the question immediately above the answer to the question, while providing the name of the witness, who will sponsor the answer to the question and can vouch for the truth of the answer.
3. Words used in the plural shall also be taken to mean and include the singular, and vice versa.
4. The present tense shall be construed to include the past tense, and vice versa.
5. If a document is withheld under any claim of privilege, please identify and support that claim.

**QUESTION(S)/REQUEST(S)**

**QUESTION 2-1:** In Mercy Water Supply Corporation's ('Mercy') response to Mr. Blalock's First Request for Information (RFI), it is stated that there is no responsive document for the minutes from the board meeting where the termination of Reba Ivey's ('Ms. Ivey') account. Is this because Mercy's Board of Directors ('Board') never discussed, nor approved, the termination of Ms. Ivey's service account/membership with Mercy, as required by Mercy's tariff? If not, please provide documentation showing a meeting occurred and the board approved.

**QUESTION 2-2:** In the same document referenced in "QUESTION 2-2", it is also stated that there was no responsive document for the minutes from the board meeting where the transfer of the membership/service account to Adrian Rodz was discussed and approved. Is this because it was never discussed, nor approved by

the Board as required by Mercy's tariff? If not, then please provide documentation supporting that this item was discussed and approved at a board meeting.

**QUESTION 2-3:** According to Mercy, approval from the Board is required before a membership/account can be transferred or terminated, which would require a meeting of the Board for it to be discussed and approved. Was the water service to the meter, from which this complaint originated, disconnected/shut-off prior to the Board's approval of the transfer/termination?

**QUESTION 2-4:** If the membership was transferred, as Mercy first claimed, how did Adrian Rodz meet the circumstances set out in Texas Water Code 67.016 for a transfer of membership to occur?

**QUESTION 2-5:** If the answer to the previous question was through the conveyance of real estate, since Adrian Rodz is/never was related to Ms. Ivey, when did Adrian Rodz provide proof that he had purchased 1611 Bowen Loop, Cleveland, Texas 77328?

**QUESTION 2-6:** Mercy has also claimed that the account/membership of Ms. Ivey was terminated/liquidated and the remaining funds for her membership/account was sent to the address for the account/membership in the form of a check. How is it that the membership/account was both transferred and terminated, since according to Mercy's tariff only one can take place because once the membership/account was terminated/liquidated it would have not existed to be transferred?

**QUESTION 2-7:** What address was the check sent to, and who was the check addressed to? Was the person the check was addressed to alive or deceased at the time of the writing of the check?

**QUESTION 2-8:** Was the address from "QUESTION 2-7" the address for the Northern Tract or the Southern Tract? If it is the address for the Northern Tract, then how can Mercy claim that the membership/account/meter/etc. were/are for the Southern Tract?

**QUESTION 2-9:** Admit or deny that the check was returned to Mercy's office, and handed directly to Mercy's office manager? If deny, please provide a copy of the check (front and back) and records where it was cashed.