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**MR. BLALOCK'S RESPONSE TO 'MERCY WATER SUPPLY
CORPORATION'S MOTION TO QUASH COMPLAINANT'S SECOND
REQUEST FOR INFORMATION'**

WHY THE REQUEST SHOULD NOT BE QUASHED

Mr. Blalock does not believe that the Request for Information ("RFI") should be quashed for the following reason(s):

1. Mr. Blalock would have had the second RFI filed in a timely manner, if Mercy Water Supply Corporation ("Mercy"), through their legal representation, had not waited to submit the information requested in the first RFI after the deadline to file written RFIs.
2. Mr. Blalock filed his second RFI in response to the information provided by Mercy in response to Mr. Blalock's first RFI, and would constitute clarification needed by Commission Staff to make an informed position on the complaint before the Public Utility Commission ("PUC").
3. Mr. Blalock did agree to the deadlines set in Order No. 7, but Mr. Blalock also expected the legal representation for Mercy to act in such a way that would not allow the deadlines to inhibit for more information, or for clarification, to be requested on the information.

Mr. Blalock believes that the reasons mentioned above would constitute extenuating circumstances, and that the Administrative Law Judge ("ALJ") would agree that if not for the actions of the legal representation for Mercy on releasing the information, then the second RFI could, and would, have been filed in a timely manner as allowed by the deadline for written RFIs.

CONSLUSION

Mr. Blalock believes that his second RFI, other than being outside the deadline, but only because of the filing date of the information requested in the first RFI, there is no argument on why it should not be allowed. There was a lack of evidence in response the first RFI, in relation to Board meetings that would have been required to liquidate/terminate/transfer/etc. Ms. Ivey's membership/service account, and Mr. Blalock's second RFI was for clarification on if those meeting happened or not and for further clarification on the information that was provided. Mr. Blalock also believes that this second RFI would not create a burden on any parties, if the ALJ allows it to stand and allows Mercy to have the 20 days given by

the Texas Administrative Code ("TAC"), since the 20 days would be up in time to give Commission Staff time to review the response to the second RFI before having to file their position.

REQUEST FOR RELIEF

Mr. Blalock respectfully request that the ALJ allow for the second RFI to remain, for Mercy to be compelled to respond as the information/clarification is needed, and for Mercy to be given the 20 days as allowed by the TAC to respond.

Respectfully Submitted,

/s/ John Preston Blalock