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COMPLAINT OF
JOHN BLALOCK
AGAINST MERCY
WATER SUPPLY
CORPORATION

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PUBLIC UTILITY
COMMISSION OF
TEXAS
FILING SECTION

**MOTION TO RECLASSIFY JOHN BLALOCK'S SECOND RFI TO
MERCY AND MOTION TO COMPEL RESPONSE TO THE QUESTIONS**

HOW SHOULD IT BE RECLASSIFIED

After further study and consideration on the matter, Mr. Blalock would like to reclassify the questions in the document titled *JOHN BLALOCK'S SECOND REQUEST FOR INFORMATION TO MERCY WATER SUPPLY CORPORATION*. He would like to change the classification from them being considered a second Request for Information ("RFI") to the questions being a continuation of the first RFI as they are just questions asked as clarification to the responses from Mercy Water Supply Corporation ("Mercy") provided as response to the first RFI from Mr. Blalock.

WHY SHOULD IT BE RECLASSIFIED

Mr. Blalock believes it should be reclassified as the questions are being asked as clarification on the responses to the first RFI, which Mr. Blalock believes to be lacking in response as some records were left out and Mr. Blalock also believes that expanding on if the Board of Directors for Mercy ("Board") did or

did not meet on the matters of terminating/cancelling Reba Ivey's ("Ms. Ivey") account/membership or to transfer the account/membership to Adrian Rodz ("Mr. Rodz, as is required by Mercy's tariff.

WHY SHOULD MERCY BE COMPELLED TO RESPOND

As the questions would be considered a continuation of the first RFI, then they would be part of a RFI that has been filed in a timely manner and before the November 18th deadline for written request.

The response(s) to the first RFI are lacking in information, and the record on Reba Ivey's ("Ms. Ivey") membership/account are not complete, as noted by the missing copy of the check that Mercy has stated, in response to RFI from Commission Staff ("Staff"), was sent in relation to the liquidation of the membership/account, nor is there paperwork showing Board approval or a notice of the liquidation.

The response(s) to the questions asked are need for Staff to be able to make an informed decision, and for Mercy to clarify if they followed proper procedure as required by Mercy's tariff and any/all state/federal regulations/laws.

CONCLUSION

Mr. Blalock believes that with the questions being clarifications on the original responses, the second RFI should be reclassified as a continuation of the

first RFI. And, that Mercy should be compelled to answer, as the clarifications on the responses to the first RFI are needed for Staff to be able to make a proper Statement of Position on the matter in January as records are not complete.

REQUEST FOR RELIEF

Mr. Blalock respectfully request that this (these) motion(s) be granted.