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DOCKET NO. 51764

COMPLIANCE FILING FOR	§	BEFORE THE
DOCKET 49758 (APPLICATION	§	
OF MARK PATTERSON FOR	§	PUBLIC UTILITY COMMISSION
TEMPORARY RATES FOR A	§	
NONFUNCTIONING UTILITY)	§	OF TEXAS

MARK PATTERSON’S RESPONSE TO ORDER NO. 18

On November 14, 2023, the ALJ in this docket filed Order No. 18, requiring clarification from Staff of the Public Utility Commission of Texas (Commission) on matters related to Mark Patterson’s (“Patterson’s”) compliance obligations, potential sale of the Castle Water, Inc. water system, and sanctions and referral to the Commission’s enforcement division. Patterson files this response to Order No. 18 to provide additional information to the ALJ in this Docket.

I. Response to Request for Clarification

Patterson provides the following information in response to Order No. 18:

a. Whether Commission Staff has identified any outstanding compliance obligations that must be addressed as part of this docket other than Mark Patterson's failure to file the monthly reports required by the Commission’s Order in Docket No. 49758.

Patterson response: Patterson is not aware of any other compliance obligations. Patterson represented itself *pro se* until recently and legal counsel has been engaged in this Docket to assist in closing the matter and the related Receivership of the Oak Shores Water System.

b. Whether the Castle Water, Inc. water system subject to Mr. Patterson’s temporary management was sold in Docket No. 50085.

Patterson response: The Castle Water, Inc. water system has been sold and is no longer under ownership of Patterson as approved in Docket No. 50085. The system that is the subject of this docket is Oak Shores Water System.

c. Whether Commission Staff continues to recommend sanctions and referral to the Commission's enforcement division.

Patterson response: Sanctions and referral to the enforcement division are not warranted. Patterson represented itself *pro se* in this Docket until recently. Patterson took over the system that is the subject of this Docket as Receiver upon request from the Attorney General's Office of the State of Texas because the water system was a nonfunctioning utility. Patterson has worked diligently to provide the customers of Oak Shores Water System with continuous and adequate service. Patterson is also working to close out the Receivership with the Attorney General's Office and will timely file the monthly reports in this Docket as required until this Docket is finalized. The most recent monthly report filing in this Docket was made by Patterson on November 15, 2023.

II. Conclusion

Patterson respectfully requests that the Commission accept this provided clarification and deny Commission Staff's request for sanctions and referral to the Commission's Enforcement Division.

Respectfully submitted,

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ATTORNEY FOR MARK PATTERSON

CERTIFICATE OF SERVICE

I certify that notice of the filing of this document was provided to all parties of record via electronic mail on November 30, 2023, in accordance with the Order Suspending Rules, issued in Project No. 50664.

/s/Kristen O. Fancher
Kristen O. Fancher