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DOCKET NO. 51973

Petition of Rodney Earl Mohnke, et al to Amend * Before the Public Utility Commission
Water Certificate of Convenience and * of the State of Texas
Necessity of HMW Special Utility District *
By Expedited Release *

Request for Information

TO: Applicants Rodney Earl Mohnke, et al, by and through their attorneys of record, DuBois, Bryant & Campbell, LLP, 303 Colorado, Suite 2300, Austin, Texas 78701

Pursuant Texas Public Utility Commission Rule 22.144, the HMW Special Utility District of Harris and Montgomery Counties (“HMW”) hereby requests the party above to respond to the following questions and requests for admission, and produce the documents shown below that are within your possession, custody, or control, within twenty (20) days of service of this request. Your responses and production of said documents and items shall be made at the offices of the Law Offices of Patrick F. Timmons, Jr., 1503 Buckmann Ct, Houston, Texas 77043. Failure to timely and appropriately respond or to amend or supplement your responses may subject you and/or your attorney to sanctions under the applicable rules of the Texas Public Utility Commission (“PUC”).

HMW’s Questions

Please respond under oath to the following questions:

1. From and after January 1, 2020, state whether any officer, employee, manager, managing partner, director, authorized agent, or representative of any water provider conferred with or made any statement to any manager, owner, authorized agent or representative of the Applicants, any third party, that pertains to:
 - a. Filing, prosecuting, financing or otherwise supporting the Application to Decertify in the above-styled proceeding before the PUC,
 - b. Providing water or wastewater service to the area sought to be decertified in the above-

styled proceeding before the PUC; or

- c. Providing water service to any area within CCN No. 10342, which is held by HMW.

Answer: "YES" or "NO". _____

- 2. If your answer to answer to any portion of Question 1. is "YES", state the date, time, location, and substance of the statement, to whom it was made and the names of any other persons who heard the statement.

Answer: _____

- 3. From and after January 1, 2020, state whether any officer, employee, manager, authorized agent or representative of Applicants, or any affiliated entity, conferred with or made any statement to any manager, owner, managing partner, authorized agent, or representative of any water provider, or to any other third party, that pertains to:

- d. Filing, prosecuting, financing or otherwise supporting the Application to Decertify in the above-styled proceeding before the PUC,
- e. Providing water or wastewater service to the area sought to be decertified in the above-styled proceeding before the PUC, or
- f. Providing water service to any area within CCN No. 10342, which is held by HMW.

Answer "YES" or "NO". _____

- 4. If your answer to answer to any portion of Question 1. is "YES", state the date, time, location, and substance of the statement, to whom it was made and the names of any other persons who heard the statement.

Answer: _____

- 5. If your answer to Questions 1 or 3 were "Yes", state whether the water provider stated that it possessed a certificate of convenience and necessity, and the number of the certificate if you know it.

HMW's Requests for Documents

1. From and after January 1, 2020, all documents that are, or that record or pertain to, contacts between the Applicants and any water provider, and their respective officers, managing partners, managers, authorized agents, or other representatives thereof, that pertain to water or wastewater service to the area sought to be decertified in the above-styled proceeding before the PUC.
2. All documents possessed by Applicants, including those delivered by any water provider, that pertain to water or wastewater service to the area sought to be decertified in the above-styled proceeding before the PUC.

"Document" means writings of every kind in your possession, custody, or control, or known by you to exist, irrespective of whether the writing is one intended for transmission or transmitted internally by you, or intended for transmission or transmitted to any other person or entity (including any governmental agency or department or other governmental personnel), and includes handwritten, typewritten, printed, photocopied, photographed and/or recorded matter, and communications in words, symbols, pictures, sound records, films, tapes, and information stored in or accessible through computer or other information storage or retrieval systems, together with the codes and/or programming instructions or other materials necessary to understand and use such systems. For purposes of illustration and not limitation, the term "document" shall include correspondence ; e-mails and any corresponding attachments to responsive e-mail; transcripts of testimony or statements; letters; notes; reports; papers; files; books; records; contracts; agreements; telegrams; teletypes; facsimiles and corresponding cover sheets; diaries; calendars; bulletins; notices; circulars; announcements; instructions; schedules; minutes; notes or summaries or other records or recordings of any conversations, conferences, meetings, visits, statements, interviews, or telephone conversations; bills, statements, invoices, purchase orders or other records of obligations or expenditures; canceled checks, vouchers, receipts, or other records of payment; affidavits; charts; drawings; specifications; manuals; brochures; and memoranda of all kinds to or from any person(s), entity(s), or agency(s).

Respectfully submitted,

Law Offices of Patrick F. Timmons, Jr., P.C.

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Certificate of Service

I hereby certify that a true copy of the foregoing Request for Information was served on the addressees shown above and the Texas PUC staff on this 5th day of August, 2021, as provided by 16 TAC Section 22.74.

Patrick F. Timmons, Jr.