



## Filing Receipt

**Received - 2021-08-25 03:02:59 PM**  
**Control Number - 51973**  
**ItemNumber - 22**

**DOCKET NO. 51973**

<b>PETITION BY RODNEY EARL</b>	<b>§</b>	<b>PUBLIC UTILITY COMMISSION</b>
<b>MOHNKE, STEPHEN LEE MOHNKE,</b>	<b>§</b>	
<b>MELVIN MAX MOHNKE, KENNETH</b>	<b>§</b>	<b>OF TEXAS</b>
<b>WAYNE MOHNKE, KATHLEEN ANN</b>	<b>§</b>	
<b>MOHNKE-BLAKELY AND MEL</b>	<b>§</b>	
<b>MOHNKE, TRUSTEE OF THE</b>	<b>§</b>	
<b>MOHNKE LIVING TRUST DATED</b>	<b>§</b>	
<b>DECEMBER 7, 1996, TO AMEND H-M-</b>	<b>§</b>	
<b>W SPECIAL UTILITY DISTRICT’S</b>	<b>§</b>	
<b>CERTIFICATE OF CONVENIENCE</b>	<b>§</b>	
<b>AND NECESSITY IN HARRIS COUNTY</b>	<b>§</b>	
<b>BY EXPEDITED RELEASE</b>	<b>§</b>	

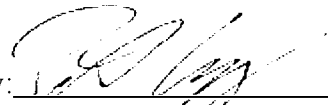
**APPLICANTS’ RESPONSE TO HMW’S REQUEST FOR INFORMATION**

On August 5, 2021, HMW filed a “Request for Information” directing the Applicants to respond to specified questions and requests for admission, and to produce requested documents (the “Request”). Applicants hereby respond to the Request by objecting to the Request in its entirety. It is well established that petitions for expedited release under TWC § 13.254 and 16 TAC § 24.245(h) are not contested cases and that no opportunity for a hearing exists. Accordingly, discovery requests are inapplicable in such cases. (See, Petition of Sunbelt Estates, LLC to Amend the City of Elmdorf’s Water Certificate of Convenience and Necessity in Bexar County by Expedited Release, Docket No. 49564, Order (Sep. 27, 2019); Order No. 7 Denying Motion to Strike and Dismiss and Denying Motion to Direct Responses to Discovery, Docket No. 49280 (Nov. 20, 2019). Applicants have no

obligation to respond to the Request, and they respectfully request an order from the Administrative Law Judge to that effect.

Respectfully submitted,

**DuBois, Bryant & Campbell, LLP**

By: \_\_\_\_\_

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**CERTIFICATE OF SERVICE**

I certify by my signature above that on the 25th day of August, 2021, a true and correct copy of the above and foregoing document was forwarded via electronic mail to all parties of record to:

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