



## **Filing Receipt**

**Filing Date - 2024-06-17 09:51:42 PM**

**Control Number - 56589**

**Item Number - 57**

**PUC DOCKET NO. 56589**

PETITION BY RESIDENTS OF GRAND	§	BEFORE THE
LAKES MUNICIPAL UTILITY DISTRICT	§	
NO. 2 APPEALING THE WATER RATES	§	PUBLIC UTILITY COMMISSION
ESTABLISHED BY THE DISTRICT'S	§	
BOARD OF DIRECTORS	§	OF TEXAS

**APPELLANT'S REQUEST FOR INFORMATION NO. 3 PURSUANT TO 16 TAC § 22.144**

(1) Before the Public Utility Commission of Texas (Commission), ratepayers residing within the jurisdiction of the Grand Lakes Municipal Utility District No. 2 (MUD) are fighting a bogus rate order [56589-5 | 56589-6] that was announced on February 19, 2024.

(2) Exhibit 1 of our petition/rate appeal [56589-1] and Exhibit 5 of our brief [56589-49] documented that the new rate order [56589-5 | 56589-6] increases residents' monthly water bills by 2.0 to 3.7 times. In fact, the increase goes to 4.5 times for a monthly usage below 1,000 gallons.

(3) We have documented before that the contested rate order was orchestrated by the MUD's Attorney, the law firm Schwartz, Page & Harding LLP. Per the MUD's 12/18/2023 Board Meeting Minutes [56589-3], the new rate order was approved by the MUD's Board following a presentation by Charlie Chapline—part of the family that owns the water company (Municipal District Services | MDS Water).

(4) The water company (Municipal District Services | MDS Water) is just an operator that gets hired and fired. It gets reimbursed for its services regardless of the MUD's finances. It *cannot* propose or request rate increases when not having a full overview of the MUD's financial situation. It is the MUD's Attorney (the law firm Schwartz, Page & Harding LLP) that drove this *questionable* agenda in the background.

(5) Rate design cannot be based on arbitrariness, wishes, and fantasy—it *must* be based on a detailed study that addresses water/wastewater cost of service for the MUD, average water/wastewater demand/usage by customer type, MUD's expenses, MUD's revenues, MUD's cash balance, proposed water/wastewater charges, and impact of the proposed water/wastewater charges on all customers. A transparent MUD would have published the said study beforehand, and allowed ratepayers to submit their comments within a specified deadline. Not to our surprise, this did *not* happen

(6) Ratepayers are entitled to justice and are determined to pursue justice. Through **Request for Information No. 3**, filed pursuant to 16 Texas Administrative Code § 22.144, the MUD is hereby asked to furnish the detailed rate design (see the previous paragraph) it used to come up with the monthly water/wastewater residential rates in the contested rate order [56589-5 | 56589-6].

(7) Instructions and guidance:

- The MUD can make it simple and ‘*come clean*’ or make it complex, continue denial and defiance, let the case extend over several years, and spend hundreds of thousands of ratepayers’ funds on legal fees.
- Being the mastermind, the MUD’s Attorney is ineligible to answer on behalf of others, or to attempt to influence and/or guide others.
- None of the parties responding to this request must seek the advice of any attorney. Under oath, each individual involved must *unhesitatingly* furnish all material and details in their possession.
- Those responding to this request for information must deliver their statement under oath.

(8) With obvious abuse of the discovery process (incomplete responses, concealed details, delays, refusals, objections, redaction, etc), a Motion to Compel will ask the Commission to intervene.

Katy, Texas on the 17th day of June 2024.

Respectfully submitted,

**on behalf of Grand Lakes MUD No. 2 ratepayers**



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#### **CERTIFICATE OF SERVICE**

I certify that notice of the filing of this pleading is being provided to all parties of record via electronic mail on June 17, 2024.

- The Board via the District’s Attorney (the law firm Schwartz, Page & Harding LLP).
- Commission’s Legal Division | Attorney assigned to this docket.



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George J. Wakileh, Ph.D.