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PUC DOCKET NO. 56589

PETITION BY RESIDENTS OF GRAND LAKES MUNICIPAL UTILITY DISTRICT NO. 2 APPEALING THE WATER RATES ESTABLISHED BY THE DISTRICT'S BOARD OF DIRECTORS	§ § § § §	BEFORE THE PUBLIC UTILITY COMMISSION OF TEXAS
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APPELLANT’S REQUEST FOR INFORMATION NO. 5, FILED UNDER 16 TAC § 22.144

(1) Incorporated by reference as if fully set forth herein is our brief [56589-54], filed on 6/12/2024.

(2) Residents can be considered officially informed of the MUD’s business *only* after such business is made available to the public by uploading it to the MUD’s [website](#). Because the MUD’s attorneys continue denial and defiance, attempting to legitimize a rate order that is criminal at best, we become obliged to request the MUD to furnish evidence that discredits their *bogus* claims.

(3) **Request for Information No. 5** pursuant to 16 Texas Administrative Code § 22.144: The MUD is hereby asked to fill in the last two columns of the table below. Documentary evidence in the form of from-to emails and screenshots of the timestamps documenting the upload to the MUD’s [website](#) is not needed now. This will be requested later *only if* the furnished dates/times do not make sense.

Meeting Minutes	Minutes Approved	PDF generated	MUD’s transmittal to Touchstone District Services	Touchstone District Services’ upload to the MUD’s website
12/18/2023	01/29/2024	02/14/2024 11:35:14am	Date/time:	Date/time:
01/29/2024	02/19/2024	02/21/2024 6:11:40pm	Date/time:	Date/time: (during 5/16/2024 – 5/21/2024) *
02/19/2024	03/18/2024	03/18/2024 04/10/2024#	Date/time:	Date/time:
03/18/2024	04/15/2024	04/16/2024 1:00:54pm	Date/time:	Date/time: (during 5/16/2024 – 5/21/2024) *
04/15/2024	05/20/2024	05/20/2024 2:34:38pm	Date/time: not needed (5/20/2024 or 5/21/2024) *	Date/time: not needed (5/20/2024 or 5/21/2024) *
05/20/2024	06/17/2024	06/17/2024 5:22:27pm	Date/time: not needed 06/17/2024	Date/time: not needed 06/17/2024

[#] The modification renders the said document invalid. A document that was signed on 03/18/2024 cannot be modified on 04/10/2024 without being signed anew.

[*] Paragraph 4.(c) of our pleading [56589-16], filed with the Commission on 5/15/2024, documented that the Grand Lakes Municipal Utility District No. 2 had per 5/15/2024 only published at the MUD’s [website](#) the Minutes for the Board’s Meeting of 2/19/2024 [56589-3]. Upon checking on 5/21/2024, the MUD had uploaded the Minutes for the Board Meetings of 1/29/2024 [56589-25], 3/18/2024 [56589-53], and 4/15/2024 [56589-45].

(4) In addition, the MUD is asked to detail what modification was done on 04/10/2024 to the PDF document of the 02/19/2024 Board Meeting Minutes.

(5) With obvious abuse of the discovery process (incomplete responses, delays, refusals, objections, etc), a Motion to Compel will ask the Public Utility Commission of Texas to intervene.

(6) Instructions and guidance:

- The MUD's Attorney, the law firm Schwartz, Page & Harding LLP, is ineligible to answer on behalf of, or to attempt to influence or guide, the media company Touchstone District Services.
- Individuals responding to this RFI must state their name, title, and affiliation and deliver their statement under oath.
- Individuals responding to this RFI must not seek the guidance of an attorney. They must *unhesitatingly* furnish all material and details in their possession.
- Should this request be unsuccessful, ratepayers become obliged to get the requested information by hiring a third-party company to sweep the servers and email accounts of the MUD's Attorney and the media company serving the MUD.

Katy, Texas on the 21st 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 21, 2024.

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



George J. Wakileh, Ph.D.