



Filing Receipt

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Item Number - 78

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. 12, FILED UNDER 16 TAC § 22.144

(1) Because the Public Utility Commission of Texas (Commission) and the State Office of Administrative Hearings (SOAH) must, in their Findings of Fact and Conclusions of Law, rely on data and information that are 100% indisputable, the Grand Lakes ratepayers / residents become obliged to use discovery to reveal answers related to the contested rate order, the Municipal Utility District's (MUD's) financial situation, and the MUD's compliance with all relevant statutes (Texas Water Code, Texas Government Code, Texas Local Government Code, etc.).

(2) The Grand Lakes community hosts 37 commercial entities and 2,739 residences (682 residences within MUD No. 2, 985 residences within MUD No. 4, and 1,072 residences within MUD No. 1). The three Grand Lakes MUDs and the Grand Lakes WCID are administered by the same Attorney (the law firm Schwartz, Page & Harding LLP) and operated by the same water company (Municipal District Services | MDS Water). Almost the same set of Consultants serve the Grand Lakes MUDs and WCID.

(3) For years, the Grand Lakes Attorney has been working actively on steering the Grand Lakes MUDs through conscious, punishable malice. In result, enormous, irreparable harm is inflicted on Grand Lakes community residents and Grand Lakes residents' funds are mishandled with millions of dollars at stake.

(4) Filed pursuant to 16 Texas Administrative Code § 22.144, **Request for Information No. 12** poses one question in two parts:

Q1.a) Fill in the following table by stating and itemizing in full (never using 'other') the annual monetary amounts the law firm Schwartz, Page & Harding LLP received from *each* of the Grand Lakes four entities (MUD No. 2, MUD No. 1, MUD No. 4, and WCID). The full picture can *only* be seen when the amounts the law firm received from the four entities are detailed. The multi-year amounts will reveal if enormous year-over-year increases materialized; a troubling situation with *multiple* incidents observed and documented throughout the Grand Lakes MUDs' financial figures.

Q1.b) Is any of the law firm's staff members an employee of any of the Grand Lakes MUDs? If so, all amounts said employee received from all four Grand Lakes MUDs/WCID must be itemized and detailed.

Amounts received by SPH LLP	2023	2022	2021	2020	2019	2018
From Grand Lakes MUD No. 2						
- Item no. a						
- Item no. b						
- Item no. c						
- Item no. d						
From Grand Lakes MUD No. 1						
- Item no. f						
- Item no. g						
- Item no. h						
- Item no. i						
From Grand Lakes MUD No. 4						
- Item no. k						
- Item no. l						
- Item no. m						
- Item no. n						
From Grand Lakes WCID						
- Item no. p						
- Item no. q						
- Item no. r						
- Item no. s						
Amnts recv'd by SPH employee						
- Item no. u						
- Item no. v						
- Item no. w						
- Item no. x						

(5) Instructions and guidance:

- This RFI must be answered by the MUD's Bookkeeper and approved by the MUD's Auditor.
- 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 MUD's Bookkeeper or Auditor.
- Responses to this RFI must not be coordinated. Doing so will be punishable.
- A statement responding to this RFI must be under oath, and state the person's name, title, and affiliation.
- Individuals responding to this RFI must not seek the guidance of an attorney. They must *unhesitatingly* furnish all material and details in their possession.

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

Katy, Texas on the 27th day of June 2024.

Respectfully submitted,

on behalf of Grand Lakes MUD No. 2 ratepayers

George J. Wakileh, Ph.D.
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CERTIFICATE OF SERVICE

I certify that the filing of this RFI is being notified to all parties of record via e-mail on June 27, 2024.

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

A handwritten signature in black ink, reading "George J. Wakileh". The signature is fluid and cursive, with a long, sweeping tail on the final letter.

George J. Wakileh, Ph.D.