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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

MUD'S ATTORNEY REFUSES TO HONOR PETITIONERS' REQUEST FOR AUDIT REPORTS

(1) Petitioners need a number of Grand Lakes audit reports to look into. By email dated June 28, 2024, the Lead Petitioner asked paralegal Melia Berry at the MUD's Attorney (the law firm Schwartz, Page & Harding LLP) to furnish a copy of the reports before the weekend. Per July 2, 2024, there is no answer.

- Grand Lakes MUD 2: 2018, 2019, 2020.
- Grand Lakes MUD 1: 2018, 2019, 2020, 2021.
- Grand Lakes MUD 4: 2018, 2019.
- Grand Lakes WCID: 2018.

(2) Ratepayers have an unconditional right to such reports. Ratepayers must not wait weeks or months and send tens of reminders. Honoring the request takes minutes. An assistant at the law firm can do the job. There is no excuse that they did not do it thus far. Time is of the essence. The MUD's Attorney benefits from shielding information from the ratepayers. The MUD's Attorney benefits from delaying ratepayers' requests for information, especially now that case no. 56589 pends before the Commission.

(3) The evening of 7/2/2024, the Lead Petitioner asked the Lloyd Gosselink Rochelle & Townsend attorneys to advise the MUD's Attorney to forward said reports by 7/3/2024 noon, and if not received by then, the Lead Petitioner will be obliged to put in an RFI by 7/3/2024 evening.

(4) The MUD's Attorney managed to move all MUD-related meetings and documents to its offices (1300 Post Oak Blvd #2400, Houston, TX 77056), **27 miles** from Katy. The MUD's Attorney does not publish at the MUD's website the Exhibits accompanying the Board Meeting Minutes, thus shielding enormous amounts of information from the ratepayers. The claim that ratepayers can go to the law firm's offices to inspect the Exhibits or get copies of them is unlawful and unwarranted.

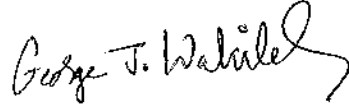
(5) The MUD's Attorney's attitude and disregard for the law are troubling. To keep the Commission apprised of the situation, petitioners are highlighting this incident in a pleading.

(6) Petitioners see this as just another point (ratepayers' unconditional right to electronic access of all MUD-related Minutes, Documents, and Reports) to be examined by the Commission and the SOAH.

Katy, Texas on the 2nd day of July 2024.

Respectfully submitted,

on behalf of Grand Lakes MUD No. 2 ratepayers



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CERTIFICATE OF SERVICE

I certify that the filing of this pleading is being notified to all parties of record via e-mail on July 2, 2024.



George J. Wakileh, Ph.D.