



Control Number: 42866



Item Number: 135

Addendum StartPage: 0

SOAH DOCKET NO. 473-14-5144
PUC DOCKET NO. 42866

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PETITION OF TRAVIS COUNTY
MUNICIPAL UTILITY DISTRICT NO.
12 APPEALING CHANGE OF
WHOLESALE WATER RATES
IMPLEMENTED BY WEST
TRAVIS COUNTY PUBLIC UTILITY
AGENCY, CITY OF BEE CAVE, TEXAS
HAYS COUNTY, TEXAS AND WEST
TRAVIS COUNTY MUNICIPAL
UTILITY DISTRICT NO. 5

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PUBLIC UTILITY COMMISSION
BEFORE THE CLERK OF

OF

ADMINISTRATIVE HEARINGS

**TRAVIS COUNTY MUNICIPAL UTILITY DISTRICT NO. 12'S RESPONSES TO
WEST TRAVIS COUNTY PUBLIC UTILITY AGENCY'S
THIRD REQUESTS FOR ADMISSION**

COMES NOW Travis County Municipal Utility District No. 12 ("TCMUD 12 or District") and timely submits these Responses to West Travis County Public Utility Agency's ("WTCPUA's") Third Requests for Admission ("RFAs").

WRITTEN RESPONSES


Attached hereto and incorporated herein by reference are TCMUD 12's written responses to the aforementioned RFAs. Such responses are made in the spirit of cooperation without waiving TCMUD 12's right to contest the admissibility of any such matters upon hearing. TCMUD 12 hereby stipulates that these responses may be treated by all parties exactly as if they were filed under oath. WTCPUA's Third RFAs were served on TCMUD 12 via email at 2:12pm on March 5, 2015. These responses are timely filed on April 9, 2015 pursuant to P.U.C. PROC. R. 22.144(c)(1) and SOAH Order No. 1 (tolling all deadlines from March 6, 2015 to March 20th).

135

Respectfully Submitted,

SMITH TROSTLE & HUERTA LLP


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By: 
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**ATTORNEYS FOR TRAVIS COUNTY
MUNICIPAL UTILITY DISTRICT NO. 12**

CERTIFICATE OF SERVICE

I hereby certify that on this 9th day of April, 2015 a true and correct copy of the above and foregoing document is being served via electronic mail, facsimile, U.S. mail and/or hand delivery to all parties of record.


Miguel A. Huerta

**TRAVIS COUNTY MUNICIPAL UTILITY DISTRICT NO. 12's RESPONSES TO
WEST TRAVIS COUNTY PUBLIC UTILITY AGENCY'S
THIRD REQUESTS FOR ADMISSIONS ("RFA")**

RFA NO. 3-1:

Admit or deny that the document attached to this RFA as "RFA 3-1 Attachment 1" is the same document that was attached to TCMUD 12's Requests for Admissions and Requests for Production to the WTCPUA, dated July 14, 2014, as "Exhibit C."

RESPONSE:

Admit.

RFA NO. 3-2:

Admit or deny that the document attached to this RFA as "RFA 3-2 Attachment 2" is the same document that was attached to TCMUD 12's Requests for Admissions and Requests for Production to the WTCPUA, dated July 14, 2014, as "Exhibit D."

RESPONSE:

Admit.

RFA NO. 3-3:

Admit or deny that the rate methodology for the rates charged by WTCPUA to TCMUD 12 for wholesale water services, adopted by the Board of Directors on November 15, 2012 and November 21, 2013, is the same.

RESPONSE:

Deny.