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PUBLIC UTILITY COMMISSION  
BEFORE THE STATE OFFICE  
FILING CLERK

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 §

OF

ADMINISTRATIVE HEARINGS

**TRAVIS COUNTY MUNICIPAL UTILITY DISTRICT NO. 12'S RESPONSES TO  
WEST TRAVIS COUNTY PUBLIC UTILITY AGENCY'S  
FOURTH 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") Fourth Requests for Admission ("RFAs").

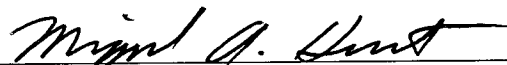
**WRITTEN RESPONSES**

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 Fourth RFAs were served on TCMUD 12 via email at 1:50pm on March 31, 2015. These responses are timely filed on April 15, 2015, which is 15 days after receipt of requests.

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 15<sup>th</sup> 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  
FOURTH REQUESTS FOR ADMISSIONS ("RFA")**

**RFA NO. 4-1:**

Admit or deny that TCMUD 12 received documents, on or before January 28, 2013, from WTCPUA or its representatives relating to the development of wholesale water service rates that were presented or discussed at the January 28, 2013 WTCPUA wholesale customer meeting held at the WTCPUA office.

**RESPONSE:**

Deny.

**RFA NO. 4-2:**

Admit or deny that WTCPUA or its representatives discussed or gave a presentation regarding the development of WTCPUA's wholesale water service rates to the attendees at the January 28, 2013 wholesale customer meeting held at the WTCPUA office.

**RESPONSE:**

TCMUD 12 can neither admit or deny because no one representing or from TCMUD 12 was in attendance at the January 28, 2013 wholesale customer meeting as reflected in its response to WTCPUA RFA 1-33.

**RFA NO. 4-3:**

Admit or deny that WTCPUA or its representatives asked questions to the attendees regarding the development of wholesale water rates at the January 28, 2013 wholesale customer meeting held at the WTCPUA office.

**RESPONSE:**

TCMUD 12 can neither admit or deny because no one representing or from TCMUD 12 was in attendance at the January 28, 2013 wholesale customer meeting as reflected in its response to WTCPUA RFA 1-33.

**RFA NO. 4-4:**

Admit or deny that TCMUD 12 received documents, on or before March 25, 2013, from WTCPUA or its representatives relating to the development of wholesale water service rates that were presented or discussed at the March 25, 2013 WTCPUA wholesale customer meeting held at the WTCPUA office.

**RESPONSE:**

Deny.

**RFA NO. 4-5:**

Admit or deny that WTCPUA or its representatives discussed or gave a presentation regarding the development of WTCPUA's wholesale water service rates to the attendees at the March 25, 2013 wholesale customer meeting held at the WTCPUA office.

**RESPONSE:**

TCMUD 12 can neither admit or deny because no one representing or from TCMUD 12 was in attendance at the March 25, 2013 wholesale customer meeting as reflected in its response to WTCPUA RFA 1-33.

**RFA NO. 4-6:**

Admit or deny that WTCPUA or its representatives asked questions to the attendees regarding the development of wholesale water rates at the March 25, 2013 wholesale customer meeting held at the WTCPUA office.

**RESPONSE:**

TCMUD 12 can neither admit or deny because no one representing or from TCMUD 12 was in attendance at the March 25, 2013 wholesale customer meeting as reflected in its response to WTCPUA RFA 1-33.

**RFA NO. 4-7:**

Admit or deny that TCMUD 12 received documents, on or before April 1, 2013 from WTCPUA or its representatives relating to the development of wholesale water service rates that were presented or discussed at the April 1, 2013 WTCPUA wholesale customer meeting held at the WTCPUA office.

**RESPONSE:**

Admit.

**RFA NO. 4-8:**

Admit or deny that WTCPUA or its representatives discussed or gave a presentation regarding the development of WTCPUA's wholesale water service rates to the attendees at the April 1, 2013 wholesale customer meeting held at the WTCPUA office.

**RESPONSE:**

Admit.

**RFA NO. 4-9:**

Admit or deny that WTCPUA or its representatives asked questions to the attendees regarding the development of wholesale water rates at the April 1, 2013 wholesale customer meeting held at the WTCPUA office.

**RESPONSE:**

Admit.

**RFA NO. 4-10:**

Admit or deny that TCMUD 12 received documents, on or before April 9, 2013 from WTCPUA or its representatives relating to the development of wholesale water service rates that were presented or discussed at the April 9, 2013 WTCPUA wholesale customer meeting held at the WTCPUA office.

**RESPONSE:**

Admit.

**RFA NO. 4-11:**

Admit or deny that WTCPUA or its representatives discussed or gave a presentation regarding the development of WTCPUA's wholesale water service rates to the attendees at the April 9, 2013 wholesale customer meeting held at the WTCPUA office.

**RESPONSE:**

Admit.

**RFA NO. 4-12:**

Admit or deny that WTCPUA or its representatives asked questions to the attendees regarding the development of wholesale water rates at the April 9, 2013 wholesale customer meeting held at the WTCPUA office.

**RESPONSE:**

Admit.

**RFA NO. 4-13:**

Admit or deny that TCMUD 12 received documents, on or before May 6, 2013, from WTCPUA or its representatives relating to the development of wholesale water service rates that were presented or discussed at the May 6, 2013 WTCPUA wholesale customer meeting held at the WTCPUA office.

**RESPONSE:**

Admit.

**RFA NO. 4-14:**

Admit or deny that WTCPUA or its representatives discussed or gave a presentation regarding the development of WTCPUA's wholesale water service rates to the attendees at the May 6, 2013 wholesale customer meeting held at the WTCPUA office.

**RESPONSE:**

Admit.

**RFA NO. 4-15:**

Admit or deny that WTCPUA or its representatives asked questions to the attendees regarding the development of wholesale water rates at the May 6, 2013 wholesale customer meeting held at the WTCPUA office.

**RESPONSE:**

Deny.

**RFA NO. 4-16:**

Admit or deny that TCMUD 12 received documents, on or before May 14, 2013, from WTCPUA or its representatives relating to the development of wholesale water service rates that were presented or discussed at the May 14, 2013 WTCPUA wholesale customer meeting held at the WTCPUA office.

**RESPONSE:**

Admit.

**RFA NO. 4-17:**

Admit or deny that WTCPUA or its representatives discussed or gave a presentation regarding the development of WTCPUA's wholesale water service rates to the attendees at the May 14, 2013 wholesale customer meeting held at the WTCPUA office.

**RESPONSE:**

Admit.

**RFA NO. 4-18:**

Admit or deny that WTCPUA or its representatives asked questions to the attendees regarding the development of wholesale water rates at the May 14, 2013 wholesale customer meeting held at the WTCPUA office.

**RESPONSE:**

Deny.

**RFA NO. 4-19:**

Admit or deny that Joyce met with WTCPUA representatives between January 1, 2013 and November 20, 2013, in addition to the wholesale customer meetings held at the WTCPUA office on January 28, 2013, March 25, 2013, April 1, 2013, April 9, 2013 , May 6, 2013 , and May 14, 2013, to discuss the development of wholesale water service rates.

**RESPONSE:**

Admit.



**RFA NO. 4-20:**

Admit or deny that Joyce is not a member of the City of Austin's Committee referenced on page 45, lines 28-32 of Joyce's rebuttal testimony.

**RESPONSE:**

Admit.

**RFA NO. 4-21:**

Admit or deny that the votes taken at the City of Austin's Committee referenced on page 46, lines 1-3 of Joyce's rebuttal testimony were not binding on the City of Austin.

**RESPONSE:**

Admit.

**RFA NO. 4-22:**

Admit or deny that the City of Austin did implement the votes taken by the City of Austin's Committee referenced on page 46, lines 1-3 of Joyce's rebuttal testimony.

**RESPONSE:**

Admit.

**RFA NO. 4-23:**

Admit or deny that the City of Austin was not required to take any actions based upon the votes taken at the City of Austin's Committee referenced on page 46, lines 1-3 of Joyce's rebuttal testimony.

**RESPONSE:**

Admit.