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

PETITION OF TRAVIS COUNTY	§	L'ING CLE
MUNICIPAL UTILITY DISTRICT	§	
NO. 12 APPEALING CHANGE OF	§	BEFORE THE STATE OFFICE
WHOLESALE WATER RATES	§	
IMPLEMENTED BY WEST	§	
TRAVIS COUNTY PUBLIC	§	
UTILITY AGENCY, AND THE	§	\mathbf{OF}
CITY OF BEE CAVE, TEXAS,	§	
HAYS COUNTY, TEXAS AND	§	ADMINISTRATIVE HEARINGS
WEST TRAVIS COUNTY	§	
MUNICIPAL UTILITY DISTRICT	§	
NO. 5	§	

WEST TRAVIS COUNTY PUBLIC UTILITY AGENCY'S SUPPLEMENTAL RESPONSES TO TRAVIS COUNTY MUNICIPAL UTILITY DISTRICT NO. 12'S REQUESTS FOR ADMISSION AND REQUESTS FOR PRODUCTION

TO: Travis County Municipal Utility District No. 12, by and through its attorney of record, J. Kay Trostle, Smith Trostle & Huerta LLP, 4401 Westgate Blvd., Suite 330, Austin, Texas 78701;

Pursuant to 30 Texas Administrative Code, Chapter 80, Subchapter D and Rule 196 of the Texas Rules of Civil Procedure, and the presiding Administrative Law Judge's Order Nos. 1-3, the West Travis County Public Utility Agency ("PUA") hereby serves its supplemental responses to Travis County Municipal Utility District No. 12's Requests for Admission and Requests for Production. Such responses are attached hereto as Exhibit A and are incorporated by reference as if fully set forth here.

Respectfully submitted,

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ATTORNEYS FOR WEST TRAVIS COUNTY PUBLIC UTILITY AGENCY

CERTIFICATE OF SERVICE

I hereby certify that a true and correct copy of the foregoing document was served on the following by U.S. Regular Mail, Certified Mail (return receipt requested), electronic mail, hand delivery and/or facsimile at the address listed below on this 8th day September, 2014.

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EXHIBIT A

WEST TRAVIS COUNTY PUBLIC UTILITY AGENCY'S SUPPLEMENTAL RESPONSES TO REQUESTS FOR PRODUCTION

Request for Production 1-12. Provide all PUA documents, including notices, agendas, and minutes, as well as any transcripts or audio recordings, of every PUA meeting that included an executive session from March 2012 through December 2013. Provide all PUA correspondence with wholesale customers relating to water rate increases.

Objections, Withholding Statements, and Response: The PUA reasserts its objections and withholding statements concerning the Attorney-Client Privilege and Work Product Privilege that the PUA memorialized in its "Responses to Travis County Municipal Utility District No. 12's Requests for Admission and Requests for Production," served on the parties to this contested case hearing on August 13, 2014, for Request for Production No. 1-12.

Subject to these objections and withholding statements, additional Documents responsive to this request are available for inspection at 816 Congress Avenue, Suite 1900, Austin, Texas 78701. Please contact David Klein at (512) 322-5818 to arrange an appointment for inspection of the documents.

Request for Production 1-13. Provide all documents related to presentations made to the PUA's wholesale water customers related to water rate increases.

Objections, Withholding Statements, and Response: The PUA reasserts its objections and withholding statements concerning the Attorney-Client Privilege and Work Product Privilege that the PUA memorialized in its "Responses to Travis County Municipal Utility District No. 12's Requests for Admission and Requests for Production," served on the parties to this contested case hearing on August 13, 2014, for Request for Production No. 1-13.

Subject to these objections and withholding statements, additional documents responsive to this request are available for inspection at 816 Congress Avenue, Suite 1900, Austin, Texas 78701. Please contact David Klein at (512) 322-5818 to arrange an appointment for inspection of the documents.

Request for Production 1-14. Provide all documents related to changed conditions experienced by the PUA related to wholesale water rate increases.

Objections, Withholding Statements, and Response: The PUA reasserts its objections and withholding statements concerning the Attorney-Client Privilege and Work Product Privilege that the PUA memorialized in its "Responses to Travis County Municipal Utility District No. 12's Requests for Admission and Requests for Production," served on the parties to this contested case hearing on August 13, 2014, for Request for Production No. 1-14.

Subject to these objections and withholding statements, additional documents responsive to this request are available for inspection at 816 Congress Avenue, Suite 1900, Austin, Texas 78701. Please contact David Klein at (512) 322-5818 to arrange an appointment for inspection of the documents.

Request for Production 1-16. Provide all documents in the possession or control of the PUA related to the current rates charged in Texas by other sellers of water for resale.

Response: Additional Documents responsive to this request are available for inspection at 816 Congress Avenue, Suite 1900, Austin, Texas 78701. Please contact David Klein at (512) 322-5818 to arrange an appointment for inspection of the documents.