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

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

**TRAVIS COUNTY MUNICIPAL UTILITY DISTRICT NO. 12'S
SUPPLEMENTAL RESPONSES REQUEST FOR DISCLOSURES**

COMES NOW Travis County Municipal Utility District No. 12 ("TCMUD 12 or District") and timely submits these Supplemental Responses to Request for Disclosures in accordance with P.U.C. PROC. R. 22.144(i).

Respectfully Submitted,

SMITH TROSTLE & HUERTA LLP
4401 Westgate Blvd., Ste. 330
Austin, Texas 78745
(512) 494-9500 (Telephone)
(512) 494-9505 (Facsimile)
ktrostle@smithtrostle.com

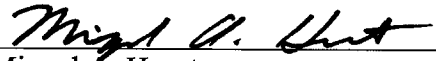
By: Miguel A. Huerta
Miguel A. Huerta
State Bar No. 00787733

J. Kay Trostle
State Bar No. 20238300

ATTORNEYS FOR TRAVIS COUNTY
MUNICIPAL UTILITY DISTRICT NO. 12

CERTIFICATE OF SERVICE

I hereby certify that a on this 7th day of November 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

REQUEST FOR DISCLOSURES

Pursuant to TEXAS RULE OF CIVIL PROCEDURE 194, and SOAH Order No. 1, TCMUD 12 makes the disclosures of the information or material described in TEXAS RULE OF CIVIL PROCEDURE 194.2 on August 15, 2014, as follows:

(a) the correct names of the parties to the contested case hearing;

Response:

*As indicated in SOAH Order No. 4, the following is no longer a party to this case:
TCEQ Executive Director*

*The Public Utility Commission of Texas Legal Division is now a party to this case:
Jessica Gray
Public Utility Commission of Texas
Legal Division
1701 N. Congress Ave.
Austin, Texas 78701
512-936-7228
512-936-7268 Fax*

(c) the legal theories and, in general, the factual bases of the responding party's claims or defenses (the responding party need not marshal all evidence that may be offered at trial);

Response:

TCMUD 12's previous response filed on August 15, 2014 is hereby replaced in its entirety with the following:

As reflected in SOAH Order Nos. 1 and 2, this proceeding is to determine if the PUA's protested rates charged to TCMUD 12 pursuant to the Wholesale Water Services Agreement adversely affect the public interest. TCMUD 12, as the petitioner, has prefiled evidence that the wholesale water rates that the PUA began charging January 1, 2014 are adverse to the public interest, under 16 TAC § 24.133(a). TCMUD 12 stated the general factual bases for this appeal in its Petition. TCMUD 12's prefiled direct case, including the testimonies of Joseph A. DiQuinzio, Jay Joyce, and Jay Zarnikau state the specific factual bases of TCMUD 12's claims. TCMUD 12 claims that the 2014 rate change adversely affects the public interest as evidenced by the PUA's abuse of monopoly power in its provision of water service to TCMUD 12. The factors that demonstrate the PUA has abused monopoly power include the PUA's change in the computation of the revenue requirement and rate from one methodology to another; the PUA's disparately

greater bargaining power, including limitations on TCMUD 12's alternative means and costs, and problems of obtaining alternative water service; and the PUA ability to control the price and quantity of water services in the market served by TCMUD 12 at the retail level.

(f) for any testifying expert:

(iii) the general substance of the expert's mental impressions and opinions and a brief summary of the basis for them, or if the expert is not retained by, employed by, or otherwise subject to the control of the responding party, documents reflecting such information.

Response:

A summary describing the general substance of the experts' mental impressions and opinions of TCMUD 12's experts have been set out in the Direct Testimony of those experts. See, e.g., Direct Testimony of Jay Joyce at p. 5, lines 9-25 and p.6, lines 1-15, and Direct Testimony of Dr. Jay Zarnikau at p. 5, lines 12-28.

(iv) if the expert is retained by, employed by, or otherwise subject to the control of the responding party:

(a) all documents, tangible things, reports, models, or data compilations that have been provided to, reviewed by, or prepared by or for the expert in anticipation of the expert's testimony; and

Response:

The documents and discovery responses relied on by TCMUD 12's experts were identified in the Direct Testimony of those experts.

(b) the expert's current resume and bibliography;

Response:

The List of Utility Proceedings in which Mr. Joyce has testified is attached to his direct testimony as Exhibit JJJ-2.