



Control Number: 44809



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SOAH DOCKET NO. 473-16-1848.WS  
DOCKET NO. 44809

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APPLICATION OF QUADVEST, L.P. FOR  
RATE/TARIFF CHANGE

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PUBLIC UTILITY COMMISSION

OF

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**QUADVEST L.P.'S RESPONSES TO OFFICE OF  
PUBLIC UTILITY COUNSEL'S FIFTH REQUEST FOR INFORMATION**

To: Office of Public Utility Counsel by and through their attorneys of record, Tonya Baer, Christiaan Siano, Office of Public Utility Counsel, 1701 N. Congress Avenue, Suite 9-180, P.O. Box 12397, Austin, Texas 78711-2397.

COMES NOW, Quadvest, L.P. ("Quadvest"), by and through their attorney of record, respond to Office of Public Utility Counsel's Fifth Request for Information. Quadvest stipulates pursuant to PUC Procedural Rule 22.144(c)(F) that the following responses to requests for information may be treated by all parties as if the answers were filed under oath.

Respectfully submitted,

**COZEN O'CONNOR**

By: Tammy Wavle Shea  
Tammy Wavle Shea  
State Bar No. 24008908  
1221 McKinney, Suite 2900  
Houston, Texas 77010  
Phone: (713) 750-3148  
Fax: (832) 214-3905  
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**ATTORNEYS FOR QUADVEST, L.P.**

## CERTIFICATE OF SERVICE

I hereby certify that a true and correct copy of Quadvest L.P.'s Responses to OPUC's Fifth RFIs was served on all parties of record in this proceeding on this the 25<sup>th</sup> day of April, 2016, by facsimile, electronic mail, U.S. first-class mail, postage prepaid, or by hand delivery.

Tammy Wavle Shea  
Tammy Wavle-Shea  
by Debra Ellis

**OFFICE OF PUBLIC UTILITY COUNSEL**

**SOAH DOCKET NO. 473-16-1848.WS**

**Docket No. 44809**

**REQUEST NUMBER: OPUC 5-1**

**COMPANY NAME:** Quadvest, L.P.

**DATE DUE:** 04/15/16

**EXTENSION DATE:**

**INFORMATION REQUESTED:**

5-1 Referencing Confidential "WP Test Year P&L from Quickbooks (Water & Sewer)," please provide a copy of this workpaper updated to reflect January 2015 through December 2015.

**REQUESTED BY:** Office of Public Utility Counsel

**RESPONSE:** See "OPUC 5-1 WP - 2015 P&L from Quickbooks Water & Sewer (Confidential)", attached. This schedule will be submitted confidentially.

**SUPPORTING WITNESS:**

Jeff Eastman

*The foregoing response to the above information request is accurate and complete, and contains no material misrepresentations or omissions based upon present facts known to the undersigned. The undersigned agrees to immediately inform the Requestor if any matters are discovered which would materially affect the accuracy or completeness of the information provided in response to the above information request.*

**Signature of Company Representative**

/s/ Jeff Eastman

**Date Provided:** 04/25/16

**OFFICE OF PUBLIC UTILITY COUNSEL**

**SOAH DOCKET NO. 473-16-1848.WS**

**Docket No. 44809**

**REQUEST NUMBER: OPUC 5-2**

**COMPANY NAME:** Quadvest, L.P.

**DATE DUE:** 04/25/16

**EXTENSION DATE:**

**INFORMATION REQUESTED:**

5-2 Referencing "VIP Test Year Usage (Tiered) & Revenue Proof," provide monthly reports from January 2015 to April 2016 that show the monthly number of customers, by meter size for each system listed.

**REQUESTED BY:** Office of Public Utility Counsel

**RESPONSE:** See "OPUC 5-2 WP - Jan 2015 thru Mar 2016 Active Water And Sewer Meters" attached.

**SUPPORTING WITNESS:**

Jeff Eastman

*The foregoing response to the above information request is accurate and complete, and contains no material misrepresentations or omissions based upon present facts known to the undersigned. The undersigned agrees to immediately inform the Requestor if any matters are discovered which would materially affect the accuracy or completeness of the information provided in response to the above information request.*

**Signature of Company Representative**

/s/ Jeff Eastman

**Date Provided:** 04/25/16

[illegible]

[illegible]

**OFFICE OF PUBLIC UTILITY COUNSEL**

**SOAH DOCKET NO. 473-16-1848.WS**  
**Docket No. 44809**

**REQUEST NUMBER: OPUC 5-3**

**COMPANY NAME:** Quadvest, L.P.

**DATE DUE:** 04/25/16

**EXTENSION DATE:**

**INFORMATION REQUESTED:**

5-3. Referencing "WP-Test Year Active Water and Sewer Meters," please provide this report updated to reflect December 2015 and April 2016.

**REQUESTED BY:** Office of Public Utility Counsel

**RESPONSE:** See "OPUC 5-2 WP - Jan 2015 thru Mar 2016 Active Water And Sewer Meters" attached.

**SUPPORTING WITNESS:**

Jeff Eastman

*The foregoing response to the above information request is accurate and complete, and contains no material misrepresentations or omissions based upon present facts known to the undersigned. The undersigned agrees to immediately inform the Requestor if any matters are discovered which would materially affect the accuracy or completeness of the information provided in response to the above information request.*

**Signature of Company Representative**

/s/ Jeff Eastman

**Date Provided:** 04/25/16



**OFFICE OF PUBLIC UTILITY COUNSEL**

**SOAH DOCKET NO. 473-16-1848.WS**  
**Docket No. 44809**

**REQUEST NUMBER: OPUC 5-4**

**COMPANY NAME:** Quadvest, L.P.

**DATE DUE:** 04/25/16

**EXTENSION DATE:**

**INFORMATION REQUESTED:**

5-4. Referencing "WP Test Year Water Pumpage," please provide this report updated to reflect the months of January 2015 to April 2016,

**REQUESTED BY:** Office of Public Utility Counsel

**RESPONSE:** See "OPUC 5-4 WP - Jan 2015 to Mar 2016 Water Pumpage" attached.

**SUPPORTING WITNESS:**

Jeff Eastman

*The foregoing response to the above information request is accurate and complete, and contains no material misrepresentations or omissions based upon present facts known to the undersigned. The undersigned agrees to immediately inform the Requestor if any matters are discovered which would materially affect the accuracy or completeness of the information provided in response to the above information request.*

**Signature of Company Representative**

/s/ Jeff Eastman

**Date Provided:** 04/25/16

[illegible]

**OFFICE OF PUBLIC UTILITY COUNSEL**

**SOAH DOCKET NO. 473-16-1848.WS**  
**Docket No. 44809**

**REQUEST NUMBER: OPUC 5-5**

**COMPANY NAME:** Quadvest, L.P.

**DATE DUE:** 04/25/16

**EXTENSION DATE:**

**INFORMATION REQUESTED:**

5-5 For the systems under each of the districts listed below, please provide monthly reports from January 2015 to April 2016 that show the monthly number of gallons billed to customers under the following consumption blocks: 0— 10,000 gallons; 10,000—20,000 gallons; 20,000 — 30,000 gallons; over 30,000 gallons.

- a. "Quadvest"
- b. "Decker"
- c. "Shaw"

**REQUESTED BY:** Office of Public Utility Counsel

**SUPPORTING WITNESS:**

Jeff Eastman

*The foregoing response to the above information request is accurate and complete, and contains no material misrepresentations or omissions based upon present facts known to the undersigned. The undersigned agrees to immediately inform the Requestor if any matters are discovered which would materially affect the accuracy or completeness of the information provided in response to the above information request.*

**Signature of Company Representative**

/s/ Jeff Eastman

**Date Provided:** 04/25/16

Jan 2015 to March 2016 Water Usage

2015	2016												2018 Total	Grand Total	
	1	2	3	4	5	6	7	8	9	10	11	12			
Quadrant (E, Shaw & Decker)															
Under 10K															
37,099,000	36,056,000	35,182,000	41,213,000	42,726,000	43,829,000	47,113,000	60,957,000	56,640,000	52,229,000	544,396,000	43,352,000	28,776,000	52,458,000	125,588,000	669,940,000
4,293,000	3,598,000	3,598,000	8,202,000	9,409,000	8,802,000	15,665,000	37,584,000	32,080,000	26,283,000	179,397,000	1,397,000	13,981,000	13,981,000	203,402,000	1,111,111,000
1,470,000	1,231,000	1,075,000	2,947,000	3,305,000	2,862,000	7,432,000	27,984,000	22,581,000	16,972,000	2,765,000	2,112,000	5,790,000	5,790,000	9,458,000	111,111,000
2,153,000	2,171,000	2,048,000	3,384,000	4,711,000	5,582,000	10,319,000	77,993,000	48,563,000	27,408,000	205,283,000	6,018,000	4,633,000	6,235,000	18,886,000	228,160,000
										1,934,729,000				177,987,000	1,211,466,000
Under 10K															
426,000	426,000	410,000	411,000	486,000	473,000	497,000	504,000	501,000	575,000	5,815,000	443,000	460,000	513,000	1,416,000	7,227,000
25,000	25,000	23,000	24,000	45,000	50,000	76,000	102,000	57,000	62,000	47,000	41,000	41,000	72,000	155,000	800,000
10,000	10,000	10,000	20,000	15,000	16,000	42,000	24,000	18,000	21,000	21,000	10,000	17,000	31,000	248,000	1,111,111,000
										235,000	4,000	25,000	51,000	76,000	311,000
										6,948,000				1,678,000	38,674,000
Under 10K															
2,497,000	2,327,000	2,023,000	2,185,000	2,656,000	2,275,000	2,314,000	3,383,000	3,153,000	2,710,000	31,460,000	22,942,000	3,550,000	2,622,000	72,146,000	38,674,000
100,000	76,000	68,000	75,000	201,000	102,000	266,000	889,000	523,000	352,000	3,140,000	78,000	17,000	155,000	371,000	3,901,000
37,000	20,000	22,000	12,000	31,000	9,000	34,000	191,000	111,000	96,000	61,000	58,000	12,000	45,000	33,000	90,000
										816,000	31,000	74,000	49,000	154,000	970,000
										36,090,000				7,829,000	43,919,000
Under 10K															
40,018,000	38,800,000	37,621,000	41,789,000	45,848,000	46,577,000	50,534,000	64,194,000	60,293,000	55,476,000	581,467,000	46,037,000	37,708,000	55,303,000	1,384,318,000	7,186,886,000
4,416,000	3,693,000	3,600,000	8,312,000	8,554,000	16,067,000	38,559,000	38,559,000	32,460,000	23,980,000	183,173,000	4,716,000	34,200,000	34,200,000	207,703,000	1,207,703,000
1,517,000	1,251,000	1,097,000	2,709,000	3,360,000	7,842,000	28,371,000	28,371,000	22,404,000	16,989,000	102,554,000	1,948,000	5,840,000	5,840,000	5,979,000	112,133,000
2,983,000	2,193,000	2,894,000	3,865,000	4,791,000	5,333,000	10,842,000	77,782,000	46,697,000	27,544,000	210,334,000	6,991,000	4,772,000	8,335,000	19,316,000	239,450,000
										1,677,727,000				187,444,000	1,865,171,000
Byer (DTS)															
47,100	46,400	47,800	46,400	47,800	48,000	46,800	51,600	49,100	48,000	444,000	433,000	200	513,000	970,000	663,200
65,900	57,000	57,000	63,200	65,900	68,000	68,000	106,600	102,600	78,100	749,600	835,000	800	101,900	1,979,000	993,200
15,900	13,500	13,500	31,700	33,300	27,000	7,000	40,600	40,700	29,900	17,500	234,900	11,100	10,000	405,000	289,500
9,400	7,700	7,700	17,000	18,600	16,000	8,000	20,600	18,900	9,700	67,000	87,300	28,000	10,000	320,000	258,000
25,000	25,000	25,000	50,000	50,000	50,000	50,000	50,000	50,000	50,000	150,000	150,000	10,000	31,000	289,500	457,000
										38,862,000				6,282,000	21,215,000
Cadeo Village															
2,086,000	1,831,000	1,734,000	1,918,000	2,116,000	1,905,000	2,100,000	2,669,000	2,436,000	2,350,000	2,009,000	2,086,000	2,101,000	1,792,000	5,979,000	31,271,000
64,000	20,000	36,000	69,000	85,000	52,000	144,000	387,000	230,000	166,000	59,000	1,403,000	86,000	91,000	90,000	1,630,000
15,000	15,000	15,000	16,000	21,000	21,000	49,000	163,000	56,000	53,000	263,000	450,000	33,000	24,000	78,000	523,000
															430,000
															71,000
															8,000
															3,700
															6,370
															34,480
															1,111,111,000

**Grand Total**

**OFFICE OF PUBLIC UTILITY COUNSEL**

**SOAH DOCKET NO. 473-16-1848.WS**  
**Docket No. 44809**

**REQUEST NUMBER: OPUC 5-6**

**COMPANY NAME:** Quadvest, L.P.

**DATE DUE:** 04/25/16

**EXTENSION DATE:**

**INFORMATION REQUESTED:**

5-6. For the systems under the "Bayer" District, please provide monthly reports from January 2015 to April 2016 that show the monthly number of gallons billed to customers under the following consumption blocks: 0 -2,000 gallons; 2,000 -10,000 gallons; 10,000 - 20,000 gallons; 20,000 - 30,000 gallons; over 30,000 gallons.

**REQUESTED BY:** Office of Public Utility Counsel

**RESPONSE:** See Response to OPUC 5-5 Jan 2015 to Mar 2016 Water Usage."

**SUPPORTING WITNESS:**

Jeff Eastman

*The foregoing response to the above information request is accurate and complete, and contains no material misrepresentations or omissions based upon present facts known to the undersigned. The undersigned agrees to immediately inform the Requestor if any matters are discovered which would materially affect the accuracy or completeness of the information provided in response to the above information request.*

**Signature of Company Representative**

/s/ Jeff Eastman

**Date Provided:** 04/25/16

**OFFICE OF PUBLIC UTILITY COUNSEL**

**SOAH DOCKET NO. 473-16-1848.WS**  
**Docket No. 44809**

**REQUEST NUMBER: OPUC 5-7**

**COMPANY NAME:** Quadvest, L.P.

**DATE DUE:** 04/25/16

**EXTENSION DATE:**

**INFORMATION REQUESTED:**

5-7. For the systems under the "Caddo Village" District, please provide monthly reports from January 2015 to April 2016 that show the monthly number of gallons billed to customers under the following consumption blocks: 0 - 10,000 gallons; 10,000 - 15,000 gallons; 15,000 -20,000 gallons; 20,000 - 30,000 gallons; over 30,000 gallons.

**REQUESTED BY:** Office of Public Utility Counsel

**RESPONSE:** See Response to "OPUC 5-5 Jan 2015 to Mar 2016 Water Usage."

**SUPPORTING WITNESS:**

Jeff Eastman

*The foregoing response to the above information request is accurate and complete, and contains no material misrepresentations or omissions based upon present facts known to the undersigned. The undersigned agrees to immediately inform the Requestor if any matters are discovered which would materially affect the accuracy or completeness of the information provided in response to the above information request.*

**Signature of Company Representative**

/s/ Jeff Eastman

**Date Provided:** 04/25/16