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Item Number: 121

Addendum StartPage: 0

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

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PUBLIC UTILITY COMMISSION

OF

TEXAS

**QUADVEST L.P.'S REQUESTS FOR DISCLOSURE
TO COMMISSION STAFF**

To: Commission Staff by and through their attorneys of record, Margaret Uhlig Pemberton, Karen S. Hubbard, Douglas Brown and Alexander Petak, Public Utility Commission of Texas, 1701 N. Congress Avenue, P.O. Box 13326, Austin, Texas 78711-3326.

Quadvest, L.P. ("Quadvest") serves the following Requests for Disclosure to the Commission Staff ("Staff").

Respectfully submitted,

COZEN O'CONNOR

By: Tammy Wavle Shea
Tammy Wavle Shea *by permission Debra Ellis*
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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 Requests for Disclosure was served on all parties of record in this proceeding on this the 12th day of May, 2016, by facsimile, electronic mail, U.S. first-class mail, postage prepaid, or by hand delivery.

Tammy Wavle Shea
Tammy Wavle-Shea

by permission
Debra Ellis

**QUADVEST L.P.'S REQUESTS FOR DISCLOSURE
TO COMMISSION STAFF**

- (a) The correct names of the parties to the lawsuit.
- (b) The name, address and telephone number of any potential parties.
- (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).
- (d) The amount and any method of calculating economic damages.
- (e) The name, address and telephone number of persons having knowledge of relevant facts and a brief statement of each identified person's connection with this case.
- (f) For any testifying expert:
 - (1) the expert's name, address and telephone number;
 - (2) the subject matter on which the expert will testify;
 - (3) 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;
 - (4) 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
 - (B) the expert's current resume and bibliography.
- (g) Any discoverable indemnity and insuring agreements described in Rule 192.3(f).
- (h) Any discoverable settlement agreements described in Rule 192.3(g).
- (i) Any discoverable witness statements described in Rule 192.3(h).