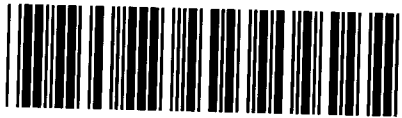


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DOCKET NO. 44809

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

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**QUADVEST L.P.'S FIRST REQUEST FOR INFORMATION
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.

In connection with the Application filed by Quadvest, L.P. for a Rate/Tariff Change, Quadvest, L.P. ("Quadvest") requests that the Public Utility Commission of Texas ("Staff"), by and through its attorney of record, provide the following information within ten (10) days of receipt of these requests. It is further requested that the answers to the requests for information be made under oath, and that each item of information be made available as it is completed, rather than upon compilation of all information requested. Each answer should identify the person responsible for preparing that answer (other than the purely clerical aspects of its preparation) and the name of the witness in this proceeding who will sponsor the answer and who can vouch for its accuracy. These requests are continuing in nature, and should there be a change in circumstances which would modify or change an answer supplied by you, such changed answer should be submitted immediately as a supplement to your original answer.

DEFINITIONS AND EXPLANATORY NOTES

1. When the request calls for the identification of a "person or witness," the identification shall include a full name, business address and business telephone number. The identification should also include a job title and name of employer.
2. The terms "document" and "documents" are used in their broadest sense and shall mean and include all written, printed, typed, recorded, or graphic matter of every kind and description, including drafts, originals and copies, and all attachments and appendices thereto. Without limiting the foregoing, the terms "document" and "documents" shall include all agreements, contracts, communications, correspondence, letters, telegrams, telexes, messages, memoranda, records, reports, books, summaries, tape recordings or other records of telephone conversations or interviews, summaries or other records of personal conversations, minutes or summaries or other records of meetings and conferences, summaries or other records of negotiations, other summaries, diaries, diary entries, calendars, appointment books, time record, instructions, work assignments, forecasts, statistical data, statistical statements, financial statements, work sheets, work papers, drafts, graphs, maps, charts, tables, accounts, analytical records, consultants' reports, appraisals, bulletins, brochures, pamphlets, circulars, trade letters, press releases, notes, notices, marginal notations, notebooks, telephone records, bills, statements, records of obligation and expenditure, invoices, lists, journals, advertising, recommendations, printouts, compilations, tabulations, analysis, studies, surveys, transcripts of hearings, transcripts of testimony, affidavits, expense reports, microfilm, microfiche, articles, speeches, tape or disk recordings, sound recordings, video recordings, film, tape, photographs, punch cards, programs, data compilation from which information can be obtained, and other printed, written, handwritten, type-written, recorded, stenographic, computer-generated, computer-stored, or electronically-stored matter, however, and by whomever produced, prepared, reproduced, disseminated, or made. The terms "non-privileged document" and "non-privileged documents" also include all copies of documents by whatever means made, except that where a document is identified or produced, identical copies thereof which do not contain any markings, additions, or deletions different from the original need not be separately produced.
3. If any of the information requests is available in machine-readable form (such as paper or magnetic tapes, drums, disks or other storage), state the form in which it is available and describe the type of computer or other machinery required to read the information.
4. When a request calls for the identification of a "document," the identification should include the following:
 - a. the full name and address of the author(s) by whom the document was written, prepared, recorded or made;
 - b. the date of the document;
 - c. the title and/or "re" of the document;
 - d. the subject matter of the document;

- e. the full name and address of the recipient and every person who received copies of the document;
 - f. the full name and address of the person who has possession, custody or control of the document, or who is in charge of maintaining the document; and
 - g. if the document has been lost, shredded or destroyed (whether intentionally or unintentionally) an explanation of the reasons for and causes of such loss, shredding or destruction.
5. The term “studies” includes any document, as defined herein, which reflects or was utilized in the collection, evaluation, analysis, summarization or characterization of information in connection with the subjects referred to in this proceeding.
6. The term “Staff” or “Public Utility Commission of Texas” includes all of its agents, employees, parent companies, subsidiaries, affiliates, predecessors, successors, or assigns.

**QUADVEST, L.P.'S FIRST REQUEST FOR INFORMATION
TO THE PUBLIC UTILITY COMMISSION OF TEXAS**

Please refer to the Direct Testimony of Debi Loockerman.

- Quadvest 1-1 Reference W/P 1(d)-(e), Bates 28 – The capital structure used to compute the Staff's recommended revenue requirement does not match Sears. The weighted interest amount appears too high which results in a lower income tax amount. Please correct.
- Quadvest 1-2 Refer to the direct testimony of Debi Loockerman. Provide docket numbers for all approved Orders at the PUC upon which she bases her opinion as to: (1) Accumulated deferred taxes; (2) Customer deposits; (3) 1/12th Working capital; (4) Non-recurring expenses; (5) Prepaids; (6) Other R&M; and (7) Rate case expenses.

Respectfully submitted,

COZEN O'CONNOR

By: Tammy Wavle Shea
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Houston, Texas 77010
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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 First Request for Information was served on all parties of record in this proceeding on this the 18th 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