

Control Number: 44809



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

RECEIVED

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

PUBLIC UTILITY COMMISSI

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COMMISSION STAFF'S RESPONSE TO QUADVEST'S REQUEST FOR INFORMATION

COMES NOW the Staff of the Public Utility Commission of Texas (Staff), representing the public interest and files this Response to Quadvest's Request for Information (RFI).

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.

Response: The referenced work papers were based on Quadvest's capital reported in the application rather than the hypothetical capital structure proposed by Ms. Sears. The appropriate interest calculation is rate base of \$11,090,857 times debt ratio of 0.4897 times cost of debt of 0.048 = \$260,697. The change results in an increase to Staff's recommended revenue requirement of \$92,946. Staff intends to correct testimony on the record at the hearing. (Supporting Witness: Debi Loockerman)

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.

Response: (1)-(6): None; (7): PUC Docket No. 39896, PUC Docket No. 40295. (Supporting Witness: Debi Loockerman)

Respectfully Submitted,

PUBLIC UTILITY COMMISSION OF TEXAS LEGAL DIVISION

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DOCKET NO. 44809 SOAH DOCKET NO. 473-16-1848.WS CERTIFICATE OF SERVICE

I certify that a copy of this document will be served on all parties of record on or before May 18, 2016 in accordance with 16 TAC § 22.74.

Douglas M. Brown