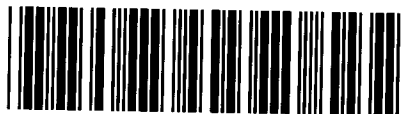




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APPLICATION OF QUADVEST, L.P.
FOR A RATE/TARIFF CHANGE

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PUBLIC UTILITY COMMISSION
FILED

OF TEXAS

**COMMISSION STAFF'S RESPONSE TO QUADVEST'S REQUESTS FOR
DISCLOSURES**

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 Disclosures.

(a) The correct names of the parties to the lawsuit.

PUC Staff, OPUC, and Quadvest

(b) The name, address and telephone number of any potential parties.

NA

(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).

See Staff's Direct Case

(d) The amount and any method of calculating economic damages.

NA

(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.

Debi Loockerman, 1701 N. Congress Avenue, P.O. Box 13326 Austin, Texas 78711, 512-936-7384 (testifying witness)

Sean Scaff, 1701 N. Congress Avenue, P.O. Box 13326 Austin, Texas 78711, 512-936-7210 (testifying witness)

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Emily Sears, 1701 N. Congress Avenue, P.O. Box 13326 Austin, Texas 78711, 512-936-7224 (testifying witness)

Heidi Graham, Emily Sears, 1701 N. Congress Avenue, P.O. Box 13326 Austin, Texas 78711, 512-936-7139 (Team leader of Technical Review – Consulted with Sean Scaff and reviewed testimony)

(f) for any testifying expert:

(1) the expert's name, address, and telephone number;

Debi Loockerman, 1701 N. Congress Avenue, P.O. Box 13326 Austin, Texas 78711, 512-936-7384

Sean Scaff, 1701 N. Congress Avenue, P.O. Box 13326 Austin, Texas 78711, 512-936-7210

Emily Sears, 1701 N. Congress Avenue, P.O. Box 13326 Austin, Texas 78711, 512-936-7224

(2) the subject matter on which the expert will testify;

Debi Loockerman – See Direct Testimony

Sean Scaff – See Direct Testimony

Emily Sears – See Direct Testimony

(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;

See Staff's Direct Case

(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

Provided by email on May 13th and 16th of 2016

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

See Debi Loockerman Direct Testimony Attachments 1 and 2

See Sean Scaff Direct Testimony Attachment 1

See Emily Sears Direct Testimony Attachments 1 and 2

(g) any indemnity and insuring agreements described in Rule 192.3(f);

NA

(h) any settlement agreements described in Rule 192.3(g);

NA

(i) any witness statements described in Rule 192.3(h);

Rule 192.3(h)


See Staff's Direct Case

Respectfully Submitted,

**PUBLIC UTILITY COMMISSION OF TEXAS
LEGAL DIVISION**

Margaret Uhlig Pemberton
Division Director

Stephen Mack
Managing Attorney

with permission 

Douglas M. Brown
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P.O. Box 13326
Austin, Texas 78711-3326

**PUC 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 May 18, 2016,
in accordance with 16 TAC § 22.74.

w/ permission 

Douglas M. Brown