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

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BEFORE THE STATE OFFICE
OF
ADMINISTRATIVE HEARINGS

**OFFICE OF PUBLIC UTILITY COUNSEL'S
STATEMENT OF POSITION**

The Office of Public Utility Counsel (OPUC) respectfully submits this statement of position, pursuant to P.U.C. Proc. R. 22.124. Quadvest, L.P. (Quadvest) bears the burden of proof on each point in its application under the laws, rules, and standards in Chapter 13 and the Commission's rules. In addition to the positions taken by OPUC in its own filed testimony, OPUC's position is that Quadvest has failed to meet its burden. Further, OPUC has reviewed Quadvest's application, all discovery and responses, and the testimony of Staff and Intervenors, and generally agrees that the adjustments to revenue requirement and revenue deficiency proposed by Commission Staff also have merit. Additionally, any adjustments to revenue requirement and revenue deficiency will have flow-through impacts on OPUC's own calculations. Finally, OPUC reserves the right to present evidence and cross examine witnesses on all issues related to Quadvest's application set out in the Preliminary Order and/or raised by the parties or the ALJs at the hearing.

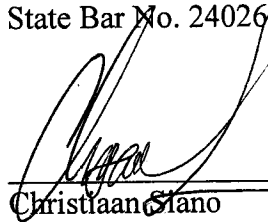
Conclusion

The evidence does not support the Company's application in this case. Quadvest has not met its burden of proof and the application should not be approved as filed. OPUC reserves the right to update its positions on the issues addressed above as this case proceeds and to take additional positions to the extent the record raises new issues.

Dated: May 20, 2016

Respectfully submitted,

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ATTORNEYS FOR THE
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CERTIFICATE OF SERVICE
SOAH DOCKET NO. 473-16-1848.WS
PUC DOCKET NO. 44809

I hereby certify that today, May 20, 2016, a true copy of the Office of Public Utility Counsel's Statement of Position was served on all parties of record via hand delivery, facsimile, or United States First-Class Mail.


Christiaan Siano