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Addendum StartPage: 0

P.U.C. DOCKET NO. 45231
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RATEPAYERS' APPEAL OF THE
DECISION BY TROPHY CLUB
MUNICIPAL UTILITY DISTRICT
NO. 1 TO CHANGE RATES

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PUBLIC UTILITY COMMISSION
OF TEXAS
PUBLIC UTILITY COMMISSION
FILING CLERK

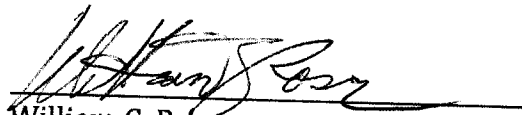
TCMUD 1 RATEPAYERS FIRST REQUEST FOR INFORMATION TO
TROPHY CLUB MUNICIPAL UTILITY DISTRICT NO. 1
RATEPAYER NO. 1-1 THROUGH 1-12

To: Trophy Club Municipal Utility District No. 1, through its council of record, John J. Carlton, The Carlton Law Firm P.L.L.C, 2705 Bee Cave Road, Suite 200, Austin, Texas 78746

Pursuant to 16 Tex. Admin. Code § 22.144, Ratepayers' Representative requests that Trophy Club Municipal Utility District No. 1 provide responses and produce documents in response to Ratepayers' First Request for Information.

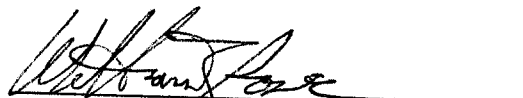
Date: April 29, 2016

Respectfully Submitted


William C. Rose
TCMUD 1 Ratepayers Representative
(817) 491-1117
219 Inverness Drive

CERTIFICATE OF SERVICE

I certify that a copy of this document will be served on all parties of record on April 29, 2016, in the following manner: First Class U.S. mail and/or Certified Mail Return Receipt Requested.


William Rose

**TCMUD 1 RATEPAYERS FIRST REQUEST FOR INFORMATION TO
TROPHY CLUB MUNICIPAL UTILITY DISTRICT NO. 1
RATEPAYER NO. 1-1 THROUGH 1-12**

INSTRUCTIONS

1. Responses and any Document production shall be limited to the information available to Trophy Club MUD No. 1 at the time of the decision to increase rates.
2. Trophy Club MUD No.1's responses to Ratepayers' 1st RFI shall be provided within the time limit provided by the presiding officer or, if the presiding officer has not provided a time limit, within twenty (20) days.
3. Trophy Club MUD No. 1's responses to Ratepayers' 1st RFI shall be in sufficient details to fully present all the relevant facts.
4. Each response must be made under oath and identify the person that prepared the response or the person under whose direct supervision the response was prepared. Additionally, each response must also identify the sponsoring witness, if any.
5. Copy the specific question or document request immediately above each response. With respect to the production of documents, indicate the specific document request(s) to which the documents are being produced.
6. Trophy Club MUD No. 1 has a continuing duty to supplement its' responses to Ratepayers' 1st RFI if it acquires information upon the basis of which it knows or should know that the response was incorrect or incomplete when made or though correct or complete when made, is materially incorrect or incomplete. Trophy Club MUD No. 1 shall amend its' prior response within five (5) working days of acquiring the information.
7. If any responsive Document, Electronically Stored Information, or tangible item is withheld under any claim of privilege, provide a privilege log identifying each Document for which a privilege is claimed, together with the following information:
 - a. Date the Document was created;
 - b. Subject matter of the Document; and
 - c. The basis upon which such privilege is claimed.
8. Electronically Stored Information and Documents in an electronic format shall be produced with metadata intact.
9. If the response to any request is voluminous, provide a detailed index of the voluminous material and the means by which Ratepayers may obtain the voluminous material.

10. The present tense shall be construed to include the past tense, and the past tense shall be construed to include the present tense.
11. The terms "and" and "or" shall be construed as either conjunctive or conjunctive as necessary to make the request inclusive rather than exclusive.
12. Documents produced in response to Ratepayers' 1st RFI shall be Bates labeled.

DEFINITIONS

1. "Trophy Club MUD No. 1" means Trophy Club Municipal Utility District No. 1 and any entity or person acting or purporting to act on its behalf, including without limitation, attorneys agents, advisors, investigators, representatives, employees, independent contractors, or other persons.
2. "Ratepayers" means the Trophy Club Municipal Utility District No. 1 Ratepayers.
3. "Document" is used in its broadest sense to include, by way of illustration and not limitation, all written or graphic matter of every kind and description, whether printed, produced, or reproduced by any process (visually, magnetically, mechanically, electronically, or by hand); whether a final draft, initial draft, original copy, or reproduction; whether claimed as privileged or otherwise excludable from discovery; and whether or not in your actual or constructive possession custody, or control. The term includes any written, recorded, or graphic matter, however produced or reproduced, including but not limited to Electronically Stored information, correspondence, emails, telegrams, contracts, agreements, notes in any form, memoranda, reports, invoices, ledgers, spread sheets, data, models, diaries, compilations, voice recording tapes, microfilms, pictures, computer media, work papers, calendars, minutes of meetings of other writings or graphic matter, including copies containing marginal notes or variations of any of the foregoing, now or previously in your possession.
4. "Electronically Stored Information" means data that is created, altered, communicated, and stored in digital form.

**TCMUD 1 RATEPAYERS FIRST REQUEST FOR INFORMATION TO
TROPHY CLUB MUNICIPAL UTILITY DISTRICT NO. 1
RATEPAYER NO. 1-1 THROUGH 1-12**

RATEPAYER RFI NO. 1-1	Provide copy of Open Records Request submitted by Bill Rose 9/17/2014 for any documentation showing volume of sewage processed at the WWTP during any time period from January 1, 2013 through September 17, 2014. Include response.
RATEPAYER RFI NO. 1-2	Provide copy of Open Records Request submitted by Bill Rose 2/9/2015 and response 02/20/2015 9:58:55 AM CST.
RATEPAYER RFI NO. 1-3	Provide copy of Open Records Request submitted by Bill Rose 3/7/2015 and response 3/20/2015 9:12:07 AM CDT.
RATEPAYER RFI NO. 1-4	Provide copy of Open Records Request submitted by Bill Rose 3/26/2015 and response 4/13/2015 8:39:07 AM CDT.
RATEPAYER RFI NO. 1-5	Provide copy of Open Records Request submitted by Bill Rose 6/5/2015 and response 6/19/2015 4:16:53 PM CDT
RATEPAYER RFI NO. 1-6	Provide copy of Open Records Request submitted by Bill Rose 6/29/2015 and responses 7/17/2015 3:57:15 PM CDT; 7/20/2015 9:35:01 AM CDT; and 7/21/2015 9:19:01 AM CDT.
RATEPAYER RFI NO. 1-7	Provide copy of 8/19/2015 MUD No. 1 Budget Workshop meeting video with transcript starting with Director Twomey's statement "Before we do that, staying on page 6 ..." at 02:40:09 through Director Carr's statement "... conservative is 240, 250, OK" ending at 02:41:44
RATEPAYER RFI NO. 1-8	Provide monthly wastewater treatment plant logs showing volumes of sewage processed for each month of the test year.
RATEPAYER RFI NO. 1-9	Provide total volume of all water used by all commercial accounts on a monthly basis for the test year.
RATEPAYER RFI NO. 1-10	Provide total volume of all water used by all commercial accounts on a monthly basis for the test year that is not charged a sewer fee.
RATEPAYER RFI NO. 1-11	Provide total volume of all water used by all residential accounts on a monthly basis for use during the months of December, January, and February of the test year.

**RATEPAYER RFI
NO. 1-12**

Provide total volume of all irrigation water used by all residential accounts on a monthly basis for use during the months of December, January, and February of the test year.