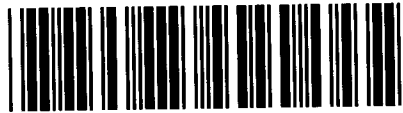


Control Number: 45231



Item Number: 52

Addendum StartPage: 0

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RATEPAYERS' APPEAL OF THE
DECISION BY TROPHY CLUB
MUNICIPAL UTILITY DISTRICT
NO. 1 TO CHANGE RATES

§
§
§
§

BEFORE THE STATE OFFICE
OF
ADMINISTRATIVE HEARINGS

PUBLIC UTILITY COMMISSION
FILING CLERK

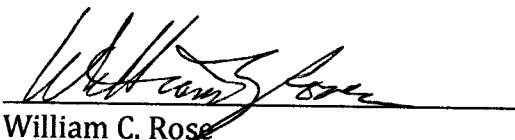
**TCMUD 1 RATEPAYERS SECOND REQUEST FOR INFORMATION TO
TROPHY CLUB MUNICIPAL UTILITY DISTRICT NO. 1
RATEPAYER NO. 2-1 THROUGH 2-8**

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' Second Request for Information.

Date: June 7, 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 June 7, 2016, in the following manner: First Class U.S. mail and/or Certified Mail Return Receipt Requested.



William Rose

**TCMUD 1 RATEPAYERS SECOND REQUEST FOR INFORMATION TO
TROPHY CLUB MUNICIPAL UTILITY DISTRICT NO. 1
RATEPAYER NO. 2-1 THROUGH 2-8**

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' 2nd 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' 2nd 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' 2nd 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’ 2nd 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 SECOND REQUEST FOR INFORMATION TO
TROPHY CLUB MUNICIPAL UTILITY DISTRICT NO. 1
RATEPAYER NO. 2-1 THROUGH 2-8**

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|----------------------------------|--|
| RATEPAYER RFI
NO. 2-1 | State TCEQ permit limits for Trophy Club Municipal Utility District No. 1's wastewater treatment plant. |
| RATEPAYER RFI
NO. 2-2 | State limits for Trophy Club Municipal Utility District No. 1's wastewater treatment plant from the Preliminary Engineering Report Wastewater Treatment Facility and Addendums prepared by the Wallace Group and provide a copy. |
| RATEPAYER RFI
NO. 2-3 | Provide basis for selection of 18,000 gallon cap for residential sewer charges. |
| RATEPAYER RFI
NO. 2-4 | Provide wastewater customer class cost allocation for FY13, FY14, FY15 and test year. |
| RATEPAYER RFI
NO. 2-5 | Provide correlation between customer class cost allocation for wastewater and volumetric flows at the wastewater treatment plant for FY13, FY14, FY15 and test year. |
| RATEPAYER RFI
NO. 2-6 | Provide agenda, packet, power point and minutes, from June 5, 2015 Special Meeting |
| RATEPAYER RFI
NO. 2-7 | State the date that Trophy Club MUD No. 1 Board of Directors was first presented a draft FY16 budget and provide copy of the agenda. |
| RATEPAYER RFI
NO. 2-8 | State the date that Trophy Club MUD No. 1 adopted the FY16 budget. |