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PUBLIC UTILITY COMMISSION  
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APPLICATION OF DOUBLE § BEFORE THE STATE OFFICE  
DIAMOND UTILITY COMPANY, INC. § OF  
FOR WATER AND SEWER § ADMINISTRATIVE HEARINGS  
RATE/TARIFF CHANGE §

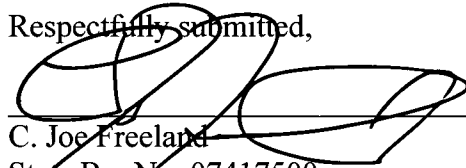
**WHITE BLUFF RATEPAYERS GROUP'S RESPONSE TO  
DOUBLE DIAMOND UTILITY COMPANY'S FIRST REQUEST FOR INFORMATION**

To: Double Diamond Utility Company, Inc., by and through its attorney of record, John Carlton, The Carlton Law Firm, P.L.L.C., 2705 Bee Cave Road, Suite 200, Austin, Texas, 78746

White Bluff Ratepayers Group (WBRG) provides this response Double Diamond Utility Company's First Request for Information to WBRG. WBRG stipulates that the following responses to the requests for information may be treated by all parties as if the answer was filed under oath.

**Dated: September 12, 2017**

Respectfully submitted,

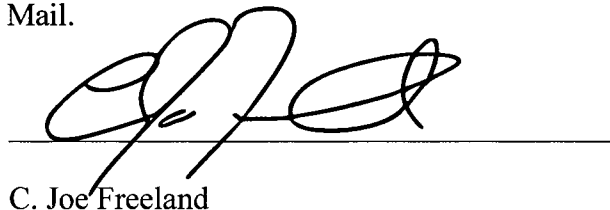


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ATTORNEY FOR  
WHITE BLUFF RATEPAYERS GROUP

**CERTIFICATE OF SERVICE**

I certify that a copy of this Response to Double Diamond's First Request for Information was served on all parties of record in this proceeding on September 12, 2017, by hand-delivery, facsimile, electronic mail, and/or First Class Mail.



C. Joe Freeland

**DOCKET 46245**  
**RESPONSE TO REQUEST FOR INFORMATION**

**DDU REQUEST TO WBRG 1-1** Please provide the legal theories and, in general the factual bases of your claims or defenses.

**RESPONSE:**

Please see WBRG'S prefiled direct testimony and exhibits filed on September 8, 2017.

Prepared by: Counsel for WBRG

**DOCKET 46245**  
**RESPONSE TO REQUEST FOR INFORMATION**

**DDU REQUEST TO WBRG 1-2** Please provide the name, address, and telephone number of persons having knowledge of relevant facts, and a brief statement of each identified person's connection with the application.

**RESPONSE:**

All ratepayers of Double Diamond Utilities. All employees and ratepayers of Double Diamond and all assigned staff at the Public Utility Commission of Texas.

Please see WBRG'S prefiled direct testimony and exhibits filed on September 8, 2017.

Prepared by: Counsel for WBRG

**DOCKET 46245**  
**RESPONSE TO REQUEST FOR INFORMATION**

**DDU REQUEST TO WBRG 1-3** Please provide the following information for any testifying expert:

- (1) the expert's name, address, and telephone number;
- (2) the subject matter on which the expert will testify;
- (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;
- (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
  - B) the expert's current resume and bibliography;

**RESPONSE:**

Please see WBRG'S prefiled direct testimony and exhibits filed on September 8, 2017.

Prepared by: Nelisa Heddin

Sponsored by: Nelisa Heddin

**DOCKET 46245**  
**RESPONSE TO REQUEST FOR INFORMATION**

**DDU REQUEST TO WBRG 1-4** Identify all documents you intend to introduce as exhibits at the hearing on the merits.

**RESPONSE:**

This request is subject to an objection.

**DOCKET 46245**  
**RESPONSE TO REQUEST FOR INFORMATION**

**DDU REQUEST TO WBRG 1-5** Identify all persons you intend to call as fact witnesses at the hearing on the merits, including their title, employer, address, telephone number and a brief statement of the subject of their testimony.

**RESPONSE:**

Please see WBRG'S prefiled direct testimony and exhibits filed on September 8, 2017.

Prepared by: Nelisa Heddin

Sponsored by: Nelisa Heddin

**DOCKET 46245**  
**RESPONSE TO REQUEST FOR INFORMATION**

**DDU REQUEST TO WBRG 1-6** Identify all persons who you have communicated with regarding the Application and draft permit and the substance of those conversations.

**RESPONSE:**

Please see WBRG'S prefiled direct testimony and exhibits filed on September 8, 2017.

Prepared by: Counsel for WBRG



**DOCKET 46245**  
**RESPONSE TO REQUEST FOR INFORMATION**

**DDU REQUEST TO WBRG 1-7** Identify all persons who assisted in the preparation of the answers to these Interrogatories.

**RESPONSE:**

Please see WBRG'S prefiled direct testimony and exhibits filed on September 8, 2017.

Prepared by: Nelisa Heddin

Sponsored by: Nelisa Heddin

**DOCKET 46245**  
**RESPONSE TO REQUEST FOR INFORMATION**

**DDU REQUEST TO WBRG 1-8** Produce all documents relevant to this matter that were provided, reviewed or created by or relied upon by any testifying expert.

**RESPONSE:**

All documents provided by Double Diamond in all prior rate cases. All documents provided by Double Diamond in this docket. All materials provided by Double Diamond in Docket 46247, and documents in WBRG'S prefiled direct testimony, exhibits, and workpapers filed in this docket. Most of these documents are in Double Diamond's possession or have previously been produced by WBRG. Additional documents can be found at:

<https://mandf.box.com/v/wbrg1-8>

Prepared by: Nelisa Heddin

Sponsored by: Nelisa Heddin

**DOCKET 46245**  
**RESPONSE TO REQUEST FOR INFORMATION**

DDU REQUEST TO WBRG 1-9    Produce all documents relevant to this matter that were provided, reviewed or created by or relied upon by any consulting witness.

**RESPONSE:**

WBRG has not engaged any consulting experts.

Prepared by: Counsel for WBRG

**DOCKET 46245**  
**RESPONSE TO REQUEST FOR INFORMATION**

**DDU REQUEST TO WBRG 1-10** Produce any resumes or *curriculum vitae*, if any, for any persons you intend to call as fact witnesses.

**RESPONSE:**

Please see WBRG'S prefiled direct testimony and exhibits filed on September 8, 2017.

Prepared by: Nelisa Heddin

Sponsored by: Nelisa Heddin

**DOCKET 46245**  
**RESPONSE TO REQUEST FOR INFORMATION**

**DDU REQUEST TO WBRG 1-11** Produce all documents relied upon in preparing answers to foregoing Requests.

**RESPONSE:**

See response to DDU REQUEST TO WBRG 1-8.

Prepared by: Counsel for WBRG