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APPLICATION OF DOUBLE § BEFORE THE STATE OFFICE  
DIAMOND PROPERTIES §  
CONSTRUCTION CO. DBA ROCK § OF  
CREEK FOR WATER RATE/TARIFF §  
CHANGE § ADMINISTRATIVE HEARINGS

**DOUBLE DIAMOND PROPERTIES CONSTRUCTION CO. D/B/A ROCK CREEK'S  
FRIST SET OF REQUESTS FOR INFORMATION TO THE PUBLIC UTILITY  
COMMISSION STAFF**

TO: The Staff of the Public Utility Commission of Texas, by a through its attorney, Michael Crnich, Attorney-Legal Division, Public Utility Commission of Texas, 1701 North Congress Avenue, P.O. Box 13326, Austin, Texas 78711-3326

Pursuant to PUC Proc. Rule 22.144, Double Diamond Properties Construction Co. d/b/a Rock Creek ("Rock Creek") hereby files its First Set of Requests for Information ("RFIs") to the Public Utility Commission Staff. Responses to the RFIs set forth in Exhibit "A" hereto should be served on the undersigned counsel for Rock Creek at the address indicated within twenty (20) days of service hereof. Exhibit "A" is attached hereto and incorporated herein for all purposes.

Respectfully submitted,

JACKSON WALKER L.L.P.

By:



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**ATTORNEYS FOR DOUBLE DIAMOND  
PROPERTIES CONSTRUCTION CO.**

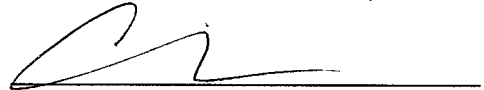
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**CERTIFICATE OF SERVICE**

This is to certify that on the 3rd day of November 2016, a true and correct copy of the foregoing document was served via email pursuant to Rule 22.74:

Michael Crnich  
Vera Dygert  
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Public Utility Commission of Texas  
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Ali Abazari

## **EXHIBIT "A"**

### **INSTRUCTIONS**

1. Your responses should conform to the Texas Rules of Civil Procedure and/or the rules of procedure of the Public Utility Commission of Texas.
2. Each document that is made available for review in response to these RFIs shall be produced as it is kept in the usual course of business (i.e., in the file folder or binder in which the documents were located when the request was served) or the documents shall be organized or labeled to correspond to the category of documents requested.
3. If the documents requested herein include electronic data and magnetic data, they shall be produced in their native format with all metadata intact.
4. When answering these RFIs, you are requested to furnish all information available to you, including information in the possession of your attorneys, investigators, consultants, employees, agents, representatives, or any other person acting on your behalf, and not merely such information as is held or known by you personally.
5. In the event any document or other thing referred to in these RFIs is not in your possession, custody, or control, specify what disposition was made of it and identify the person or entity who now has possession, custody, or control of the document or thing.
6. If you withhold any requested documents or information — including redactions of portions of documents — pursuant to an applicable privilege, provide a privilege log describing the documents, communications, or things withheld or redacted with sufficient specificity that the applicability of the privilege or protection may be assessed. See TEX. R. CIV. P. 193.3.
- \* 7. PLEASE TAKE FURTHER NOTICE that these RFIs are continuing in nature. Your answers and responses must include all documents that are currently in your possession, custody, and control and that come into your possession, custody, or control in the future.

## **REQUESTS FOR INFORMATION**

- RFI No. 1: Please provide the information or materials described in Texas Rule of Civil Procedure 194.2(c), (e), (f), and (i), as follows:
- (c) The legal theories and, in general, the factual bases of the responding party's claims or defenses;
  - (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 the case;
  - (f) 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;
  - (i) Any witness statements described in Rule 192.3(h).