



Control Number: 46439



Item Number: 12

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DOCKET NO. 46439

RECEIVED

COMPLAINT OF WES ANDERSON,
ET. AL. AGAINST QUADVEST L.P.,
QUADVEST, INC., RANCH UTILITIES
CORP., AND RANCH UTILITIES, L.P.

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PUBLIC UTILITY COMMISSION

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PUBLIC UTILITY COMMISSION
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OF TEXAS

**QUADVEST L.P., QUADVEST, INC., RANCH UTILITIES CORP., AND RANCH
UTILITIES, L.P.'S RESPONSES TO COMMISSION STAFF'S FIRST REQUEST FOR
INFORMATION TO QUADVEST QUESTION NOS. STAFF 1-1 THROUGH 1-7**

To: Commission Staff by and through their attorneys of record, Margaret Uhlig Pemberton, Karen S. Hubbard, and Michael Crnich, Public Utility Commission of Texas, 1701 N. Congress Avenue, P.O. Box 13326, Austin, Texas 78711-3326.

COMES NOW, Quadvest, L.P., Quadvest, Inc., Ranch Utilities Corp., and Ranch Utilities, L.P. ("Quadvest"), by and through their attorney of record, file this response to Commission Staff's RFI 1-1 through 1-7. Quadvest stipulates pursuant to PUC Procedural Rule 22.144(c)(F) that the following responses to requests for information may be treated by all parties as if the answers were filed under oath.

Respectfully submitted,

COZEN O'CONNOR

By: Tammy Wavle-Shea
Tammy Wavle Shea
State Bar No. 24008908
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Houston, Texas 77010
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**ATTORNEYS FOR QUADVEST, L.P.,
QUADVEST, INC., RANCH UTILITIES
CORP., AND RANCH UTILITIES, L.P.**

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CERTIFICATE OF SERVICE

I hereby certify that a true and correct copy the foregoing was served on all parties of record in this proceeding on this the 2nd day of February, 2017, by facsimile, electronic mail, U.S. first-class mail, postage prepaid, or by hand delivery.

Tammy Wavle-Shea
Tammy Wavle-Shea

w/p
N.W. Wavle

PUBLIC UTILITY COMMISSION OF TEXAS

Docket No. 46439

REQUEST NUMBER: STAFF 1-1

COMPANY NAME: Quadvest, L.P.

DATE DUE: 02/02/17

INFORMATION REQUESTED:

Staff 1-1 Was the Complainant provided notice that his meter would be changing prior to Quadvest initiating the change?

- a. If so, when?;
- b. Explain how the notice was provided to the Complainant (e.g. email, letter, etc.);
- c. Please provide a copy of the notice given to the Complainant.

REQUESTED BY: Public Utility Commission of Texas

RESPONSE:

- a. No, Stephen Jones moved into the residence after Quadvest sent notices of smart meter ("AMR") change out to its customers.
- b. Stephen Jones moved in on July 5, 2016 and the notice of AMR change out was sent to Quadvest customers on the May 10, 2016 bill and by email on May 11, 2016.
- c. A copy of the bill notice sent to the previous tenant is attached.

SUPPORTING WITNESS:

Jeff Eastman

The foregoing response to the above information request is accurate and complete, and contains no material misrepresentations or omissions based upon present facts known to the undersigned. The undersigned agrees to immediately inform the Requestor if any matters are discovered which would materially affect the accuracy or completeness of the information provided in response to the above information request.

Signature of Company Representative

/s/ Jeff Eastman

Date Provided: 02/02/17

PUBLIC UTILITY COMMISSION OF TEXAS

Docket No. 46439

REQUEST NUMBER: STAFF 1-2

COMPANY NAME: Quadvest, L.P.

DATE DUE: 02/02/17

INFORMATION REQUESTED:

Staff 1-2 Provide the account number and parcel number used to identify the Complainant's property.

REQUESTED BY: Public Utility Commission of Texas

RESPONSE:

Stephen Jones account # 00014356, 32811 Sawgrass Court parcel # 181872

SUPPORTING WITNESS:

Jeff Eastman

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Signature of Company Representative

/s/ Jeff Eastman

Date Provided: 02/02/17

PUBLIC UTILITY COMMISSION OF TEXAS

Docket No. 46439

REQUEST NUMBER: STAFF 1-3

COMPANY NAME: Quadvest, L.P.

DATE DUE: 02/02/17

INFORMATION REQUESTED:

Staff 1-3 Out of the approximately 10,000 claimed customers, how many customers currently have smart meters?

REQUESTED BY: Public Utility Commission of Texas

RESPONSE:

Currently, 10,820 customers have AMRs, which represents 99.9% of Quadvest's active customer population.

SUPPORTING WITNESS:

Jeff Eastman

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Signature of Company Representative

/s/ Jeff Eastman

Date Provided: 02/02/17

PUBLIC UTILITY COMMISSION OF TEXAS

Docket No. 46439

REQUEST NUMBER: STAFF 1-4

COMPANY NAME: Quadvest, L.P.

DATE DUE: 02/02/17

INFORMATION REQUESTED:

Staff 1-4 Provide testing requirements, testing information, and QC data provided by Master Meter that was mentioned in Mr. Jeff Eastman's affidavit.

REQUESTED BY: Public Utility Commission of Texas

RESPONSE:

Please find attached letter issued by Master Meter's Chief Engineer (Walt Vetter), which details the standards and procedures used in the testing of their smart meters (AMRs). Master Meter tests all smart meters prior to distribution, noting the test results are recorded on meter identification stickers attached to each smart meter prior to shipment. Please find smart meter test results associated with the 20 original complainants, noting that most of the test results can be confirmed via meter identification sticker. In cases where our 3rd party installer failed to properly attach meter identification sticker to work order, Quadvest requested the testing results directly from Mater Meter. The testing results indicated that all 20 of the meters have flow results within AWWA standards (98.5% to 101.5% accuracy).

SUPPORTING WITNESS:

Jeff Eastman

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Signature of Company Representative

/s/ Jeff Eastman

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PUBLIC UTILITY COMMISSION OF TEXAS

Docket No. 46439

REQUEST NUMBER: STAFF 1-5

COMPANY NAME: Quadvest, L.P.

DATE DUE: 02/02/17

INFORMATION REQUESTED:

Staff 1-5 Provide all meter testing protocols and QC data provided to Quadvest by the third-party (Southern Flowmeter Inc.) testers.

REQUESTED BY: Public Utility Commission of Texas

RESPONSE:

Please find the testing results for the 3 meters Quadvest pulled for 3rd party testing as a result of the original complaint. In addition, please find Southern Flowmeter's "Accuracy Test Procedure" manual.

SUPPORTING WITNESS:

Jeff Eastman

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Signature of Company Representative

/s/ Jeff Eastman

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PUBLIC UTILITY COMMISSION OF TEXAS

Docket No. 46439

REQUEST NUMBER: STAFF 1-6

COMPANY NAME: Quadvest, L.P.

DATE DUE: 02/02/17

INFORMATION REQUESTED:

Staff 1-6 Was the Complainant's meter tested directly? If so, provide the QC data for his meter.

REQUESTED BY: Public Utility Commission of Texas

RESPONSE:

Yes, see Master Meter test results referenced in RFI 1-4. In addition, Quadvest has requested further testing of the meter at issue. Quadvest will supplement this response once the test results are finalized.

SUPPORTING WITNESS:

Jeff Eastman

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Signature of Company Representative

/s/ Jeff Eastman

Date Provided: 02/02/17

PUBLIC UTILITY COMMISSION OF TEXAS

Docket No. 46439

REQUEST NUMBER: STAFF 1-7

COMPANY NAME: Quadvest, L.P.

DATE DUE: 02/02/17

INFORMATION REQUESTED:

Staff 1-7 Provide actual usage and weather variance data from the Complainant's account and all rainfall data available to Quadvest related to his water system area during the time period that he alleges improper metering occurred.

REQUESTED BY: Public Utility Commission of Texas

RESPONSE:

Please see attached rainfall data, which is specific to the Lake Windcrest subdivision (Stephen Jones's subdivision). When trying to obtain temperature data, weather sites only allow you to type in a zip code in order to find the nearest weather station, which happens to be Hooks Airport on the Weatherunderground website. Therefore, temperature information is provided for Spring Texas (Hooks Airport). The provided information indicates 2-3 inches of rainfall in July and 10 plus inches in August, noting all of the 10 plus inches occurred after August 11th. The average max temperature for the Spring Texas area in July and August was 95 degrees and 93 degrees, respectively. Note that the water usage for these periods would be reflected on the August and September billing statements.

SUPPORTING WITNESS:

Jeff Eastman

The foregoing response to the above information request is accurate and complete, and contains no material misrepresentations or omissions based upon present facts known to the undersigned. The undersigned agrees to immediately inform the Requestor if any matters are discovered which would materially affect the accuracy or completeness of the information provided in response to the above information request.

Signature of Company Representative

/s/ Jeff Eastman

Date Provided: 02/02/17

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