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

2017 MAR 16 PM 1: 39 PUBLIC UTILITY COMMISSION PUBLIC UTILITY COMMISSION FILING CLERK

OF TEXAS

QUADVEST L.P., QUADVEST, INC., RANCH UTILITIES CORP., AND RANCH UTILITIES, L.P.'S FIRST SUPPLEMENTAL RESPONSE TO COMMISSION STAFF'S RFI 1-6

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 supplemental response to

Commission Staff RFI 1-6. 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: Janmy Starle: Shea Tammy Wavle Shea by Debra Ellis

State Bar No. 24008908 1221 McKinney, Suite 2900 Houston, Texas 77010 Phone: (713) 750-3148 Fax: (832) 214-3905 Email: <u>tshea@cozen.com</u>

ATTORNEYS FOR QUADVEST, L.P., QUADVEST, INC., RANCH UTILITIES CORP., AND RANCH UTILITIES, L.P.

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 16th day of March, 2017, by facsimile, electronic mail, U.S. first-class mail, postage prepaid, or by hand delivery.

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Jammy Iraole-Shea Tammy Warle-Shea by Debra Eoklis

PUBLIC UTILITY COMMISSION OF TEXAS

Docket No. 46439

REQUEST NUMBER: STAFF 1-6

COMPANY NAME: Quadvest, L.P.

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.

SUPPLEMENTAL RESPONSE:

Quadvest requested additional testing from Southern Flowmeter for this meter. The testing showed that the meter had flow results of 101.6% accuracy. AWWA standards for accuracy are between 98.5% to 101.5%. Accordingly, Quadvest replaced the meter and issued a credit of \$11.12 to Mr. Jones to reflect 100% accuracy from the date of installation of this meter.

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: 03/15/17