



Control Number: 46439



Item Number: 25

Addendum StartPage: 0

SOAH DOCKET NO. 473-17-3320.WS
PUC DOCKET NO. 46439

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

BEFORE THE STATE OFFICE OF PUBLIC UTILITY COMMISSION
FILING CLERK
OF
ADMINISTRATIVE HEARINGS

**COMMISSION STAFF'S FIRST REQUEST FOR
INFORMATION TO COMPLAINANT JONES
QUESTION NOS. STAFF 1-1 to STAFF 1-2**

Pursuant to 16 Tex. Admin. Code (TAC) § 22.144, the Staff ("Staff") of the Public Utility Commission of Texas ("Commission") requests that Complainant Stephen Jones, by and through his attorney of record, provide the following information and answer the following questions under oath. The questions shall be answered in sufficient detail to fully present all of the relevant facts, within the time limit provided by the Presiding Officer or within 20 days, if the Presiding Officer has not provided a time limit. Please copy the question immediately above the answer to each question. These questions are continuing in nature, and if there is a relevant change in circumstances, submit an amended answer, under oath, as a supplement to your original answer. State the name of the witness in this cause who will sponsor the answer to the question and can vouch for the truth of the answer.

Provide an original and three copies of your answers to the questions to the Filing Clerk, Public Utility Commission of Texas, 1701 N. Congress Avenue, P.O. Box 13326, Austin, Texas 78711-3326.

25

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DOCKET NO. 46439**

**COMMISSION STAFF'S FIRST REQUEST FOR
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QUESTION NOS. STAFF 1-1 to STAFF 1-2**

DEFINITIONS

- 1) "Complainant" or "you" refers to Stephen J. Jones and any person acting or purporting to act on his behalf, including without limitation, attorneys, agents, advisors, investigators, representatives, employees or other persons.
- 2) "Document" includes any written, recorded, or graphic matter, however produced or reproduced, including but not limited to correspondence, telegrams, contracts, agreements, notes in any form, memoranda, diaries, voice recording tapes, microfilms, pictures, computer media, work papers, calendars, minutes of meetings or other writings or graphic matter, including copies containing marginal notes or variations of any of the foregoing, now or previously in your possession. In the event any documents requested by this Request for Information have been transferred beyond the Company's control, describe the circumstances under which the document was destroyed or transferred and provide an exact citation to the subject document. In the event that documents containing the exact information do not exist, but documents do exist which contain portions of the required information or which contain substantially similar information, then the definition of "documents" shall include the documents which do not exist and these documents will be provided.

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INSTRUCTIONS

- 1) Pursuant to 16 TAC § 22.144(c)(2), Staff requests that answers to the requests for information be made under oath.
- 2) Please copy the question immediately above the answer to each question. State the name of the witness in this cause who will sponsor the answer to the question and can vouch for the truth of the answer.
- 3) These questions are continuing in nature, and if there is a relevant change in circumstances, submit an amended answer, under oath, as a supplement to your original answer.
- 4) Words used in the plural shall also be taken to mean and include the singular. Words used in the singular shall also be taken to mean and include the plural.
- 5) The present tense shall be construed to include the past tense, and the past tense shall be construed to include the present tense.
- 6) If any document is withheld under any claim of privilege, please furnish a list identifying each document for which a privilege is claimed, together with the following information: date, sender, recipients or copies, subject matter of the document, and the basis upon which such privilege is claimed.
- 7) Pursuant to 16 TAC § 22.144(g)(4), if the response to any request is voluminous, please provide a detailed index of the voluminous material.
- 8) Staff requests that each item of information be made available as it is completed, rather than upon completion of all information requested.

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**COMMISSION STAFF'S FIRST REQUEST FOR
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- Staff 1-1 Please provide your last 3 years of water usage data, including usage at your previous address and your current address, until the most recently received bill.
- Staff 1-2 Please provide a description of both your current and previous properties, including:
- a. Whether you used an irrigation system of some kind, and if so, provide a description of the system.
 - b. The size of the lots.
 - c. Frequency of water usage.