



Control Number: 46439



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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  
FILING CLERK

OF TEXAS

**QUADVEST L.P., QUADVEST, INC., RANCH UTILITIES CORP., AND RANCH  
UTILITIES, L.P.'S RESPONSE TO COMMISSION STAFF'S SECOND REQUEST FOR  
INFORMATION TO QUADVEST QUESTION NOS. STAFF 2-1**

To: Commission Staff by and through their attorneys of record, Margaret Uhlig Pemberton,  
Stephen Mack, 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 2-1. Quadvest stipulates pursuant to PUC Procedural Rule 22.144(c)(F)  
that the following response to request 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  
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*by permission  
Debra Collins*

**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 23<sup>rd</sup> day of May, 2017, by facsimile, electronic mail, U.S. first-class mail, postage prepaid, or by hand delivery.

Tammy Wavle Shea  
Tammy Wavle Shea

by permission  
Debra Ellis

**PUBLIC UTILITY COMMISSION OF TEXAS**

**Docket No. 46439**

**REQUEST NUMBER: QUESTION NO. STAFF 2-1**

**COMPANY NAME: Quadvest, L.P.**

**DATE DUE: 06/05/17**

**INFORMATION REQUESTED:**

Staff 2-1 Please provide the last 3 years of water usage data for the Complainant Stephen J. Jones' address, including the time before the Complainant became the account holder. Please indicate the date the Complainant became the account holder at the address.

**REQUESTED BY: Public Utility Commission of Texas**

**RESPONSE:**

Quadvest L.P. notes that Stephen J. Jones became the account holder on or about July 5, 2016. Therefore, Quadvest believes that water usage from other account holders at this address is not relevant to the issues in this proceeding nor likely to lead to the discovery of admissible evidence and Quadvest asserts its right to raise any issues regarding admissibility of such information in this matter. Subject to and without waiving this objection, see attached file "32811 Sawgrass Court 3 Year Usage Report".

**SUPPORTING WITNESS:**

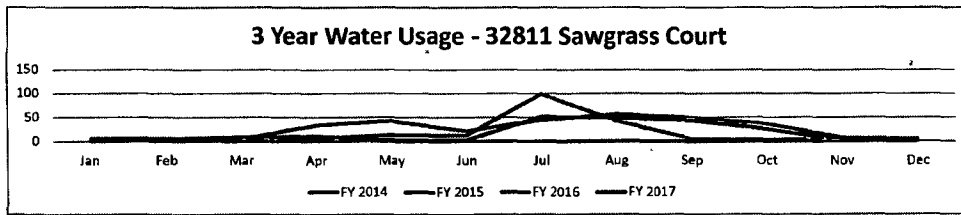
Jeff Eastman

*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:** 05/23/17



Water Usage (1000s)	Jan	Feb	Mar	Apr	May	Jun	Jul	Aug	Sep	Oct	Nov	Dec	Total *
FY 2014	3	3	4	34	42	22	45	56	49	36	7	0	301
FY 2015	3	3	2	3	3	3	52	49	45	26	2	4	195
FY 2016	1	2	3	6	13	13	99	43	5	3	6	5	199
FY 2017	5	5	9	11	-	-	-	-	-	-	-	-	30
<b>Total</b>	<b>12</b>	<b>13</b>	<b>18</b>	<b>54</b>	<b>58</b>	<b>38</b>	<b>196</b>	<b>148</b>	<b>99</b>	<b>65</b>	<b>15</b>	<b>9</b>	<b>725</b>

\*A few items to note:

- FY2014 usage was over 100K gallons higher than FY2015 and FY2016 water usage.
- FY2015 and FY2016 water usage are similar in nature (less than 5K gallons variance or 2.5%).

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3 Year Water Usage - 32811 Sawgrass Court

Monthly Gallonage (1000s)	Meter Read Date	Notes
5	1/7/2014	
3	2/5/2014	
3	3/6/2014	
4	4/5/2014	
34	5/6/2014	
42	6/7/2014	
22	7/9/2014	
45	8/9/2014	
56	9/11/2014	
49	10/10/2014	
36	11/9/2014	
7	12/11/2014	
-	1/9/2015	
3	2/9/2015	
3	3/10/2015	
2	4/10/2015	
3	5/9/2015	
3	6/10/2015	
3	7/10/2015	
52	8/9/2015	
49	9/9/2015	
45	10/9/2015	
26	11/10/2015	
2	12/10/2015	
4	1/10/2016	
1	1/28/2016	Implemented Cycle Billing
2	2/29/2016	
3	3/29/2016	
6	4/29/2016	
13	6/2/2016	
13	7/1/2016	Mr Jones Moved In
50	7/18/2016	New AMR Meter
49	7/28/2016	
43	8/31/2016	
5	9/29/2016	
3	10/28/2016	
6	11/30/2016	
5	12/30/2016	
5	1/27/2017	Replace AMR Meter & Issue Customer Credit
5	2/28/2017	
9	3/29/2017	
11	4/28/2017	