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

IN THE PUBLIC UTILITY  
COMMISSION OF TEXAS  
PUBLIC UTILITY COMMISSION  
FILING CLERK

PLAINTIFFS' WES ANDERSON, ET.'S RESPONSE TO COMMISSION STAFF'S  
SECOND REQUEST FOR INFORMATION  
QUESTION NOS. STAFF 2-1 THROUGH STAFF 2-3

TO: Commission Staff, by and through their attorneys of record, Margaret Uhlig Pemberton, Karen S. Hubbard, and Alexander Petak. Public Utility Commission of Texas Legal Division, 1701 N. Congress Ave., P.O. Box 13326, Austin, Texas 78711.

COME NOW, Complainants WES ANDERSON, ET AL., and files this response to Commission Staff's Second Request for Information, Question numbers Staff 2-1 through Staff 2-3. Complainants stipulate, 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,

HANSZEN LAPORTE, LLP

By: /s/ Daniel R. Dutko

Daniel R. Dutko

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Attorneys for Complainants

**CERTIFICATE OF SERVICE**

I hereby certify that a true and correct copy of the foregoing Response to Commission Staff's Second Request for Information to Wes Anderson, Et al. has been served to all parties by and through their counsel of record on this 27<sup>th</sup> day of July, 2017, in the following manner:

Mr. Alexander Petak  
Public Utility Commission of Texas, Legal Division  
1701 N. Congress Ave.  
P.O. Box 13326  
Austin, Texas 78711-3326  
Commission Staff

***Via Facsimile (512) 936-7268***

Ms. Tammy W. Shea  
Cozen O'Connor  
1221 McKinney, Suite 2900  
Houston, Texas 77010  
Attorney for Quadvest

***Via Facsimile (832) 214-3905***

/s/ Daniel R. Dutko  
Daniel R. Dutko

## RESPONSES TO SECOND REQUEST FOR INFORMATION

Jones – 32811 Sawgrass:

STAFF 2-1: Please list the size of your current lot.

Response: 1.14 Acres

STAFF 2-2: Does the lot contain a pool or fountains?

Response: No pool or fountain.

STAFF 2-3: Does the home have an automatic irrigation system? If so, how often is the system used?

Response: Yes we do have an irrigation system but we do not run it all the time. When it is run, the system runs every other day, twice a day, 30 heads @ 15 minutes per head, at a rate of .50 gpm.

SUPPORTING WITNESS:

Stephen J. Jones

*The foregoing response to the above request for information is accurate and complete, and contains no material misrepresentations or omissions based on 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.*

/s/ Stephen J. Jones  
Stephen J. Jones