



Control Number: 46439



Item Number: 55

Addendum StartPage: 0

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PUBLIC UTILITY COMMISSION
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COMPLAINT OF WES ANDERSON ET AL. § PUBLIC UTILITY COMMISSION
AGAINST QUADVEST L.P., QUADVEST, §
INC., RANCH UTILITIES CORP. §
AND RANCH UTILITIES, L.P. § OF TEXAS

QUADVEST L.P.'S RESPONSE TO ORDER NO. 3 AND MOTION TO CONSOLIDATE

Quadvest L.P., Quadvest, Inc., Ranch Utilities Corp., and Ranch Utilities, L.P. (collectively "Quadvest") file this response to Order No. 3 and Complainant's Motion for Continuance and, in support thereof, respectfully show as follows:

On August 29, 2017, the Administrative Law Judge issued Order No. 3 in this matter, requiring an expedited response to the motion to consolidate filed by Stephen Jones. Counsel for Quadvest was affected by Hurricane Harvey related water damage and therefore, not in the office during the week of August 28, 2017 and only returned to the office today, September 5, 2017. Therefore, good cause exists for this late filing.

Quadvest is not opposed to a 30 day continuance of the hearing on the merits given that it appears counsel for Mr. Jones was likewise affected by Hurricane Harvey. However, Quadvest is opposed to a consolidation of this matter with Docket 42729 because no efficiencies would be gained by consolidating this case. The parties have already conducted discovery and filed testimony in this matter. Quadvest has expended a great deal of resources in responding to both the first and second complaint, filing testimony, and responding to and propounding discovery. The motion to consolidate could have been filed in June, before the parties were required to expend these resources. However, it was not filed until almost three months after the second petition, and on the eve of the hearing on the merits. As can be seen from the testimony of Jeffery Eastman filed on behalf of Quadvest in this docket, each claim is necessarily fact specific, relating to the accuracy of each particular meter and the usage patterns (both historical and current) of each complainant. Therefore, consolidation would not lead to efficiencies and would result in the duplication of efforts involving Mr. Jones' complaint. Therefore, Quadvest urges the Administrative Law Judge to deny the motion to consolidate.

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Respectfully submitted,

COZEN O'CONNOR

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*by permission
Debra Ellis*

ATTORNEY FOR QUADVEST

CERTIFICATE OF SERVICE

I, Tammy Shea, certify that a copy of this document was served on all parties of record in this proceeding on September 5, 2017, by regular mail, facsimile transmission, e-mail or hand-delivery.

Tammy Wavle-Shea
Tammy Wavle-Shea
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Debra Ellis*