



Control Number: 46439



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

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COMPLAINT OF WES ANDERSON, ET. § BEFORE THE STATE OFFICE
AL. AGAINST QUADVEST L.P., §
QUADVEST, INC., RANCH UTILITIES § OF
CORP., AND RANCH UTILITIES, L.P § ADMINISTRATIVE HEARINGS

SOAH DOCKET NO. 473-17-5772.WS
PUC DOCKET NO. 47279

COMPLAINT OF WES ANDERSON, ET. § BEFORE THE STATE OFFICE
AL. AGAINST QUADVEST L.P., §
QUADVEST, INC., RANCH UTILITIES § OF
CORP., AND RANCH UTILITIES, L.P § ADMINISTRATIVE HEARINGS

COMMISSION STAFF'S FOURTH REQUEST FOR INFORMATION
TO QUADVEST L.P.
QUESTION NOS. STAFF 4-1 THROUGH STAFF 4-12

Pursuant to 16 Tex. Admin. Code § 22.144 (TAC) of the Commission's Procedural Rules, the Staff of the Public Utility Commission of Texas (Staff) requests that Quadvest L.P. by and through its attorneys of record, provide the following information and answer the following question(s) under oath. The question(s) 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 question(s) 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.

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Dated: September 20, 2017

Respectfully Submitted,

**PUBLIC UTILITY COMMISSION OF TEXAS
LEGAL DIVISION**

Margaret Uhlig Pemberton
Division Director

Karen S. Hubbard
Managing Attorney



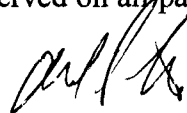
Alexander Petak
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1701 N. Congress Avenue
P.O. Box 13326
Austin, Texas 78711-3326
(512) 936-7377
(512) 936-7268 (facsimile)
Alexander.Petak@puc.texas.gov

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CERTIFICATE OF SERVICE

I certify that a copy of this document will be served on all parties of record on September 20, 2017, in accordance with 16 TAC § 22.74.



Alexander Petak

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DEFINITIONS

- 1) "Quadvest," "the Company" or "you" refers to Quadvest L.P. and any person acting or purporting to act on their 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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This information may be presented in a table format for ease of use.

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|------------------|--|
| Staff 4-1 | Please show the date each the complainants became a customer of the utility. Provide 3 years of actual water bills for the complainants from their first billing in 2014 until the most recent billing of 2017. If the complainant has not been a customer for at least 3 years provide all water usage from time of initial connection. |
| Staff 4-2 | Was the complainant provided notice that his/her meter would be changing prior to Quadvest initiating the change?
a) If so, when?
b) Explain how the notice was provided to the complainant (e.g. email, letter, etc.)
c) Please provide a copy of the notice given to the complainant |
| Staff 4-3 | Please provide the account number and parcel number used to identify each the complainants property |
| Staff 4-4 | Was the complainants meter tested directly? If so, provide the QC data for the referenced meter |
| Staff 4-5 | Did the complainants ever ask for the meters in question to be tested?
a) If so, was the meter tested?
b) Provide any findings from the test. |
| Staff 4-6 | Did Master Meter test the meter at each of the complainants homes before installation? |
| Staff 4-7 | Did Master Meter test the meter at complainant's home after they questioned the billing statements? |
| Staff 4-8 | Please provide the meter accuracy reports for all complainant's meters before the installation was completed by Master Meter. |
| Staff 4-9 | Please provide the test results on the meters identification sticker. |

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- Staff 4-10** Please provide the meter accuracy report provided by Southern Flow meter completed after the complaint.
- Staff 4-11** How did Quadvest verify the accuracy of the meter between changing out the older meters and the installation of the new meters?
- Staff 4-12** How did Quadvest verify and maintain the accuracy of these readings when initially placing into Quadvest's billing system?