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

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

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

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

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

To: Commission Staff by and through their attorneys of record, Margaret Uhlig Pemberton,  
Karen S. Hubbard and Alexander Petak, Public Utility Commission of Texas, 1701 N.  
Congress Avenue, P.O. Box 13326, Austin, Texas 78711-3326.

COMES NOW, Quadvest, L.P., ("Quadvest"), by and through their attorney of record,  
file this response to Commission Staff's RFI 4-1 through RFI 4-12. Quadvest stipulates pursuant  
to PUC Procedural Rule 22.144(c)(F) that the following responses 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 WAVE SHEA  
Tammy Wavle Shea *WPS*  
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Houston, Texas 77010  
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**ATTORNEYS FOR QUADVEST, L.P.,  
QUADVEST, INC., RANCH UTILITIES  
CORP., AND RANCH UTILITIES, L.P.**

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

TAMMY WAVE SHEA  
Tammy Wavle Shea *WPS*

**PUBLIC UTILITY COMMISSION OF TEXAS**

**Docket No. 46439 & 47279**

**REQUEST NUMBER: QUESTION NO. STAFF 4-1**

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

**DATE DUE:** 10/13/17

**INFORMATION REQUESTED:**

Staff 4-1 Please show the date each of 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.

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

**RESPONSE:**

See attachment Confidential Table 4-1. In addition, Quadvest has provided 44 months (or all available bills, if complainant does not have bills for the entire time frame requested) of complainants' bills, see Confidential Attachment 4-1. Confidential Attachment 4-1 is voluminous and exceeds 100 pages. Therefore, inspection will be available at a mutually convenient time at the offices of GDS Associates in Austin, Texas. In addition, an electronic copy of this document has been provided to Commission Staff. CONFIDENTIAL PURSUANT TO PROTECTIVE ORDER ISSUED IN DOCKET 46439.

**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:** 10/13/17

**PUBLIC UTILITY COMMISSION OF TEXAS**

**Docket No. 46439 & 47279**

**REQUEST NUMBER: QUESTION NO. STAFF 4-2**

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

**DATE DUE:** 10/13/17

**INFORMATION REQUESTED:**

- 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.

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

**RESPONSE:**

Quadvest provided the notice date and method that each complaint was provided notice of pending smart meter change out, In addition, Quadvest has provided copies of the notice sent to each of the complainants prior to smart meter change out, see Confidential Attachments 4-2A and 4-2B. CONFIDENTIAL PURSUANT TO PROTECTIVE ORDER ISSUED IN DOCKET 46439.

**SUPPORTING WITNESS:**

Jeff Eastman

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/s/ Jeff Eastman

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**PUBLIC UTILITY COMMISSION OF TEXAS**

**Docket No. 46439 & 47279**

**REQUEST NUMBER: QUESTION NO. STAFF 4-3**

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

**DATE DUE:** 10/13/17

**INFORMATION REQUESTED:**

Staff 4-3 Please provide the account number and parcel number used to identify each of the complainants property.

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

**RESPONSE:**

See Confidential Table 4-1, which includes customer account number and parcel number. CONFIDENTIAL PURSUANT TO PROTECTIVE ORDER ISSUED IN DOCKET 46439.

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/s/ Jeff Eastman

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**PUBLIC UTILITY COMMISSION OF TEXAS**

**Docket No. 46439 & 47279**

**REQUEST NUMBER: QUESTION NO. STAFF 4-4**

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

**DATE DUE:** 10/13/17

**INFORMATION REQUESTED:**

Staff 4-4 Was the complainants meter tested directly? If so, provide the QC data for the referenced meter.

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

**RESPONSE:**

Yes, the complainants' meters were tested by both Master Meter and Southern Flowmeter and all meters were found to be within AWWA standards of 98.5% to 101.5% accurate. See Confidential Attachment 4-4, 4-6, and 4-10. CONFIDENTIAL PURSUANT TO PROTECTIVE ORDER ISSUED IN DOCKET 46439.

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**PUBLIC UTILITY COMMISSION OF TEXAS**

**Docket No. 46439 & 47279**

**REQUEST NUMBER: QUESTION NO. STAFF 4-5**

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

**DATE DUE:** 10/13/17

**INFORMATION REQUESTED:**

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.

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

**RESPONSE:**

Quadvest has no record of any complainant specifically requesting that their smart meter be independently tested for accuracy. However, Quadvest has tested complainants' smart meters in order to address list of issues raised in these proceedings, see Confidential Response to Staff 4-4, 4-6, and 4-10 for details related to smart meter testing results. CONFIDENTIAL PURSUANT TO PROTECTIVE ORDER ISSUED IN DOCKET 46439.

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**PUBLIC UTILITY COMMISSION OF TEXAS**

**Docket No. 46439 & 47279**

**REQUEST NUMBER: QUESTION NO. STAFF 4-6**

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

**DATE DUE:** 10/13/17

**INFORMATION REQUESTED:**

Staff 4-6 Did Master Meter test the meter at each of the complainants homes before installation?

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

**RESPONSE:**

Yes, Master Meter performs meter accuracy tests, at their facilities, on all smart meters shipped to customers. The result of Master Meter's accuracy tests are printed on meter identification stickers ("Sticker"), which are placed on the smart meters prior to shipment to their customer (i.e. Quadvest). All meters were found to be within AWWA standards of 98.5% to 101.5% accurate, see Confidential Attachment 4-4 summarizing the Master Meter tests, as Confidential 4-6, which are the sticker pictures related to each of Master Meter's factory tests. CONFIDENTIAL PURSUANT TO PROTECTIVE ORDER ISSUED IN DOCKET 46439.

**SUPPORTING WITNESS:**

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**PUBLIC UTILITY COMMISSION OF TEXAS**

**Docket No. 46439 & 47279**

**REQUEST NUMBER: QUESTION NO. STAFF 4-7**

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

**DATE DUE:** 10/13/17

**INFORMATION REQUESTED:**

Staff 4-7 Did Master Meter test the meter at complainant's home after they questioned the billing statements?

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

**RESPONSE:**

No. Quadvest uses Southern Flowmeter, a 3<sup>rd</sup> Party lab, for after installation meter tests, not Master Meter. See Confidential Attachment 4-4 and 4-10. CONFIDENTIAL PURSUANT TO PROTECTIVE ORDER ISSUED IN DOCKET 46439.

**SUPPORTING WITNESS:**

Jeff Eastman

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**PUBLIC UTILITY COMMISSION OF TEXAS**

**Docket No. 46439 & 47279**

**REQUEST NUMBER: QUESTION NO. STAFF 4-8**

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

**DATE DUE:** 10/13/17

**INFORMATION REQUESTED:**

Staff 4-8 Please provide the meter accuracy reports for all complainant's meters before the installation was completed by Master Meter.

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

**RESPONSE:**

See Confidential Attachment 4-4 and 4-6. CONFIDENTIAL PURSUANT TO PROTECTIVE ORDER ISSUED IN DOCKET 46439.

**SUPPORTING WITNESS:**

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/s/ Jeff Eastman

**Date Provided:** 10/13/17

**PUBLIC UTILITY COMMISSION OF TEXAS**

**Docket No. 46439 & 47279**

**REQUEST NUMBER: QUESTION NO. STAFF 4-9**

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

**DATE DUE:** 10/13/17

**INFORMATION REQUESTED:**

Staff 4-9 Please provide the test results on the meters identification sticker.

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

**RESPONSE:**

See Confidential Response to RFI 4-4 and 4-6. CONFIDENTIAL PURSUANT  
TO PROTECTIVE ORDER ISSUED IN DOCKET 46439

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**PUBLIC UTILITY COMMISSION OF TEXAS**

**Docket No. 46439 & 47279**

**REQUEST NUMBER: QUESTION NO. STAFF 4-10**

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

**DATE DUE:** 10/13/17

**INFORMATION REQUESTED:**

Staff 4-10 Please provide the meter accuracy report provided by Southern Flow meter completed after the complaint.

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

**RESPONSE:**

Upon a consolidation / determination of new complainants, Quadvest pulled the complainants' smart meters on September 29, 2017 and requested Southern Flowmeter, a 3<sup>rd</sup> party lab, test each of the new complainants' smart meters. The results of these meter tests are reported in the attached table. The testing results show that all meters tested have weighted accuracies between 98.5% to 101.5%. As a result, no billing adjustments were made to complainants' accounts and Quadvest reinstalled the tested meters at the new complainants' homes. Quadvest has attached the referenced Southern Flowmeter accuracy reports for each of the new complainants' smart meters tested. See Confidential Response to RFI 4-4 and 4-10. CONFIDENTIAL PURSUANT TO PROTECTIVE ORDER ISSUED IN DOCKET 46439.

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**PUBLIC UTILITY COMMISSION OF TEXAS**

**Docket No. 46439 & 47279**

**REQUEST NUMBER: QUESTION NO. STAFF 4-11**

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

**DATE DUE:** 10/13/17

**INFORMATION REQUESTED:**

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?

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

**RESPONSE:**

HydroPro Solutions, LLC supplied and installed new smart meters (Manufactured By Master Meter) for Quadvest, noting HydroPro Solutions LLC subcontracted the actual installation of the smart meters to an experienced meter installer named AUS. During the smart meter installation process, AUS would remove Master Meter sticker ("Sticker") and attach to an "installation sheet" specific to each resident. The Sticker indicates the High, Intermediate, and Low flow accuracy results of that particular meter along with other useful information such as serial number and meter size. Also during the installation process, AUS would record the old meter gallonage reading on the "installation sheet" and handheld unit used to electronically transmit meter change out data into Quadvest's billing system. Once the installation is completed, AUS would take a photo of the completed "installation sheet" and old meter for permanent record purposes.

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**Docket No. 46439 & 47279**

**REQUEST NUMBER: QUESTION NO. STAFF 4-12**

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

**DATE DUE:** 10/13/17

**INFORMATION REQUESTED:**

Staff 4-12 How did Quadvest verify and maintain the accuracy of these readings when initially placing into Quadvest's billing system?

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

**RESPONSE:**

Quadvest has provided a comparison of old meter photo/installation sheet and the old meter reading reported in Quadvest's billing system. See Confidential Response to 4-6. CONFIDENTIAL PURSUANT TO PROTECTIVE ORDER ISSUED IN DOCKET 46439.

**SUPPORTING WITNESS:**

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