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SOAH DOCKET NO. 473-17-3320.WS

Docket No. 46439

RECEIVED

COMPLAINT OF WES ANDERSON, et al.,  
against QUADVEST LP, QUADVEST INC.,  
RANCH UTILITIES CORP., and RANCH  
UTILITIES, L.P.

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BEFORE THE STATE OFFICE OF

ADMINISTRATIVE HEARINGS

2017 NOV 21 PM 3: 53  
PUBLIC UTILITY COMMISSION  
FILING CLERK

SOAH DOCKET NO. 473-17-5772.WS

Docket No. 47279

COMPLAINT OF WES ANDERSON, et al.,  
against QUADVEST LP, QUADVEST INC.,  
RANCH UTILITIES CORP., and RANCH  
UTILITIES, L.P.

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BEFORE THE STATE OFFICE OF

ADMINISTRATIVE HEARINGS

COMPLAINANTS' RESPONSES TO COMMISSION STAFF'S THIRD REQUEST FOR  
INFORMATION TO WES ANDERSON, ET AL.  
QUESTION NOS. STAFF 3-1 THROUGH STAFF 3-2

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 Third Request for Information, Question numbers Staff 3-1 through Staff 3-2. 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 was sent to all interested parties, by and through their counsel of record on this 16<sup>th</sup> day of November, 2017.

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

*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 THIRD REQUEST FOR INFORMATION

Acebo – 10614 Serenity Sound:

STAFF 3-1: How long have you resided at your current address. If you have not lived at the current address for 3 years, file water bills from your previous residence from January 2014 until you became a Quadvest customer.

Response: Approximately 9 years.

STAFF 3-2: Please provide a description of the properties identified in the response to Staff 3-1, including:

- a) Whether or not complainant utilizes an irrigation system of some kind. If so, provide a description of the system.
- b) The size of the lots.
- c) Frequency of water usage.
- d) Does the lot contain a pool or fountain
- e) Does the home have an automatic irrigation system” If so, how often is the system used?

Response: a) Yes, we have a sprinkler system that runs 3 times per week, depending upon the rainfall;  
b) 1 acre  
c) This question is vague, however, our water usage has remained consistent throughout the time we have lived at this house.  
d) No.  
e) Yes. It runs 3 times per week, depending upon the rainfall.

SUPPORTING WITNESS:

Gail Stephens Acebo

*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/ Gail Stephens Acebo  
Gail Stephens Acebo

Barrett – 11018 Lake Windcrest:

**STAFF 3-1:** How long have you resided at your current address. If you have not lived at the current address for 3 years, file water bills from your previous residence from January 2014 until you became a Quadvest customer.

**Response:** Approximately 11 years.

**STAFF 3-2:** Please provide a description of the properties identified in the response to Staff 3-1, including:

- a) Whether or not complainant utilizes an irrigation system of some kind. If so, provide a description of the system.
- b) The size of the lots.
- c) Frequency of water usage.
- d) Does the lot contain a pool or fountain
- e) Does the home have an automatic irrigation system” If so, how often is the system used?

**Response:**

- a) Yes. We have an automatic irrigation system that run 3 times per week, to irrigate approximately 1 acre (or less) of the property.
- b) 2.80 acres
- c) This question is vague, however, our water usage has remained consistent throughout the time we have lived at this house. The only exception is during the time of the most dramatic increase in our water bills in the Summer of 2016, we were actually using less water than normal because our irrigation system was broken.
- d) We have a pool, but no fountains.
- e) Yes, 3 times per week.

SUPPORTING WITNESS:

Ethel Barrett

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/s/ Ethel Barrett  
Ethel Barrett

Deming – 10507 Crystal Cove:

**STAFF 3-1:** How long have you resided at your current address. If you have not lived at the current address for 3 years, file water bills from your previous residence from January 2014 until you became a Quadvest customer.

**Response:** Approximately 6 or 7 years ago.

**STAFF 3-2:** Please provide a description of the properties identified in the response to Staff 3-1, including:

- a) Whether or not complainant utilizes an irrigation system of some kind. If so, provide a description of the system.
- b) The size of the lots.
- c) Frequency of water usage.
- d) Does the lot contain a pool or fountain
- e) Does the home have an automatic irrigation system” If so, how often is the system used?

**Response:**

- a) Yes, but we only use it as needed.
- b) 1 acre
- c) This question is vague, however, our water usage has remained consistent throughout the time we have lived at this house.
- d) We have a pool, but no fountains.
- e) Yes, but we only use it as needed.

SUPPORTING WITNESS:

Richard Deming

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/s/ Richard Deming  
Richard Deming

Erato – 32643 Green Bend Court:

**STAFF 3-1:** How long have you resided at your current address. If you have not lived at the current address for 3 years, file water bills from your previous residence from January 2014 until you became a Quadvest customer.

**Response:** 3 ½ years.

**STAFF 3-2:** Please provide a description of the properties identified in the response to Staff 3-1, including:

- a) Whether or not complainant utilizes an irrigation system of some kind. If so, provide a description of the system.
- b) The size of the lots.
- c) Frequency of water usage.
- d) Does the lot contain a pool or fountain
- e) Does the home have an automatic irrigation system” If so, how often is the system used?

**Response:**

- a) There is an automatic irrigation system, but we do not use it.
- b) 1.48 Acres
- c) This question is vague, however, our water usage has remained consistent throughout the time we have lived at this house.
- d) We have a pool, but no fountains.
- e) Yes, but we do not use it.

SUPPORTING WITNESS:

Mary Erato

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\_\_\_\_\_/s/ Mary Erato  
Mary Erato

Floyd – 10118 Clubhouse Circle:

**STAFF 3-1:** How long have you resided at your current address. If you have not lived at the current address for 3 years, file water bills from your previous residence from January 2014 until you became a Quadvest customer.

**Response:** 17 years

**STAFF 3-2:** Please provide a description of the properties identified in the response to Staff 3-1, including:

- a) Whether or not complainant utilizes an irrigation system of some kind. If so, provide a description of the system.
- b) The size of the lots.
- c) Frequency of water usage.
- d) Does the lot contain a pool or fountain
- e) Does the home have an automatic irrigation system” If so, how often is the system used?

**Response:**

- a) Yes, for about 1 acre. It is only used when needed
- b) 1.97 acres
- c) This question is vague, however, our water usage has remained consistent throughout the time I have lived at this house.
- d) I do not have a pool or fountain.
- e) Yes, for about 1 acre, but it is only used when needed.

SUPPORTING WITNESS:

Gladys Floyd

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/s/ Gladys Floyd  
Gladys Floyd



Gardaphe – 9335 Clubhouse Circle:

**STAFF 3-1:** How long have you resided at your current address. If you have not lived at the current address for 3 years, file water bills from your previous residence from January 2014 until you became a Quadvest customer.

**Response:** Approximately 4 years

**STAFF 3-2:** Please provide a description of the properties identified in the response to Staff 3-1, including:

- a) Whether or not complainant utilizes an irrigation system of some kind. If so, provide a description of the system.
- b) The size of the lots.
- c) Frequency of water usage.
- d) Does the lot contain a pool or fountain
- e) Does the home have an automatic irrigation system” If so, how often is the system used?

**Response:**

- a) Yes, but it is only used sparingly, when needed.
- b) 2 acres
- c) This question is vague, however, our water usage has remained consistent throughout the time we have lived at this house.
- d) We have a pool and a fountain.
- e) Yes, but the system is only used sparingly when needed. I recall 2016 was particularly rainy which would have caused us to use it even less.

SUPPORTING WITNESS:

Paul Gardaphe

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/s/ Paul Gardaphe  
Paul Gardaphe

Hansen – 10314 Serenity Sound:

**STAFF 3-1:** How long have you resided at your current address. If you have not lived at the current address for 3 years, file water bills from your previous residence from January 2014 until you became a Quadvest customer.

**Response:** Approximately 2 years

**STAFF 3-2:** Please provide a description of the properties identified in the response to Staff 3-1, including:

- a) Whether or not complainant utilizes an irrigation system of some kind. If so, provide a description of the system.
- b) The size of the lots.
- c) Frequency of water usage.
- d) Does the lot contain a pool or fountain
- e) Does the home have an automatic irrigation system” If so, how often is the system used?

**Response:**

- a) Yes, twice a week.
- b) 2 acres
- c) This question is vague, however, our water usage has remained consistent throughout the time we have lived at this house.
- d) No pool or fountain
- e) Yes, it waters twice a week.

SUPPORTING WITNESS:

Randolph Hansen

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/s/ Randolph Hansen  
Randolph Hansen

Leo – 10411 Serenity Sound:

**STAFF 3-1:** How long have you resided at your current address. If you have not lived at the current address for 3 years, file water bills from your previous residence from January 2014 until you became a Quadvest customer.

**Response:** Approximately 4 years.

**STAFF 3-2:** Please provide a description of the properties identified in the response to Staff 3-1, including:

- a) Whether or not complainant utilizes an irrigation system of some kind. If so, provide a description of the system.
- b) The size of the lots.
- c) Frequency of water usage.
- d) Does the lot contain a pool or fountain
- e) Does the home have an automatic irrigation system” If so, how often is the system used?

**Response:**

- a) Yes, 3 times a week, but only for 7-8 months of the year
- b) 2 acres
- c) This question is vague, however, our water usage has remained consistent throughout the time we have lived at this house.
- d) We have a pool, but no fountains.
- e) Yes, 3 times a week, only when needed 7-8 months of the year.

SUPPORTING WITNESS:

Martin Leo

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/s/ Martin Leo  
Martin Leo

Sanders – 12130 Clara Lane:

**STAFF 3-1:** How long have you resided at your current address. If you have not lived at the current address for 3 years, file water bills from your previous residence from January 2014 until you became a Quadvest customer.

**Response:** Approximately 2 years.

**STAFF 3-2:** Please provide a description of the properties identified in the response to Staff 3-1, including:

- a) Whether or not complainant utilizes an irrigation system of some kind. If so, provide a description of the system.
- b) The size of the lots.
- c) Frequency of water usage.
- d) Does the lot contain a pool or fountain
- e) Does the home have an automatic irrigation system” If so, how often is the system used?

**Response:**

- a) Will supplement
- b) 0.126 acres
- c) This question is vague, however, my water usage has remained consistent throughout the time I have lived at this house.
- d) No pool or fountain.
- e) Will supplement.

SUPPORTING WITNESS:

Ashley Sanders

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/s/ Ashley Sanders  
Ashley Sanders

Watkins – 40610 Ithaca Lake:

**STAFF 3-1:** How long have you resided at your current address. If you have not lived at the current address for 3 years, file water bills from your previous residence from January 2014 until you became a Quadvest customer.

**Response:** Approximately 4 years

**STAFF 3-2:** Please provide a description of the properties identified in the response to Staff 3-1, including:

- a) Whether or not complainant utilizes an irrigation system of some kind. If so, provide a description of the system.
- b) The size of the lots.
- c) Frequency of water usage.
- d) Does the lot contain a pool or fountain
- e) Does the home have an automatic irrigation system” If so, how often is the system used?

**Response:**

- a) Will supplement.
- b) 0.68 acres
- c) This question is vague, however, our water usage has remained consistent throughout the time we have lived at this house.
- d) We have a pool, but no fountain.
- e) Will supplement.

SUPPORTING WITNESS:

Allyn Watkins

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/s/ Allyn Watkins  
Allyn Watkins

Westbrook – 9426 Deer Path Lane:

**STAFF 3-1:** How long have you resided at your current address. If you have not lived at the current address for 3 years, file water bills from your previous residence from January 2014 until you became a Quadvest customer.

**Response:** Approximately 7 years.

**STAFF 3-2:** Please provide a description of the properties identified in the response to Staff 3-1, including:

- a) Whether or not complainant utilizes an irrigation system of some kind. If so, provide a description of the system.
- b) The size of the lots.
- c) Frequency of water usage.
- d) Does the lot contain a pool or fountain
- e) Does the home have an automatic irrigation system” If so, how often is the system used?

**Response:**

- a) Yes. We use it occasionally when needed, in 5 minute cycles, 3 times per week.
- b) 1 acre
- c) This question is vague, however, our water usage has remained consistent throughout the time we have lived at this house.
- d) We have a pool and 1 recirculating fountain.
- e) Yes. We only use it occasionally, in 5 minute cycles 3 times per week.

SUPPORTING WITNESS:

Jill Westbrook

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/s/ Jill Westbrook  
Jill Westbrook

Yiu – 29827 Edgewater Dr.:

**STAFF 3-1:** How long have you resided at your current address. If you have not lived at the current address for 3 years, file water bills from your previous residence from January 2014 until you became a Quadvest customer.

**Response:** Approximately 5 years.

**STAFF 3-2:** Please provide a description of the properties identified in the response to Staff 3-1, including:

- a) Whether or not complainant utilizes an irrigation system of some kind. If so, provide a description of the system.
- b) The size of the lots.
- c) Frequency of water usage.
- d) Does the lot contain a pool or fountain
- e) Does the home have an automatic irrigation system” If so, how often is the system used?

**Response:**

- a) Will Supplement.
- b) 2 acres
- c) This question is vague, however, our water usage has remained consistent throughout the time we have lived at this house.
- d) We have a pool, but no fountains.
- e) Will supplement.

SUPPORTING WITNESS:

Fang Yiu

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/s/ Fang Yiu  
Fang Yiu