



Control Number: 46439



Item Number: 75

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SOAH DOCKET NO. 473-17-3320.WS

Docket No. 46439

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2017 NOV 30 AM 10:31

COMPLAINT OF WES ANDERSON, et al., § BEFORE THE STATE OFFICE OF
against QUADVEST LP, QUADVEST INC., §
RANCH UTILITIES CORP., and RANCH § ADMINISTRATIVE HEARINGS
UTILITIES, L.P. §

SOAH DOCKET NO. 473-17-5772.WS

Docket No. 47279

COMPLAINT OF WES ANDERSON, et al., § BEFORE THE STATE OFFICE OF
against QUADVEST LP, QUADVEST INC., §
RANCH UTILITIES CORP., and RANCH § ADMINISTRATIVE HEARINGS
UTILITIES, L.P. §

COMPLAINANT'S RESPONSE TO QUADVEST'S MOTION TO STRIKE

NOW COME Complainants in the above consolidated actions file this Response to Quadvest's Motion to Strike Complainants' testimony and shows as follows:

Complainants' Testimony is Not Untimely

There is no dispute by Quadvest that Complainants' testimony was timely received by Quadvest and the PUC. A copy of Complainants' testimony is attached as Exhibit "A".

The only issue raised by Quadvest in its Motion to Strike is Quadvest's complaints of "procedural errors" in filing the testimony. On November 15, 2017, the date Complainants' testimony was due, Complainants filed their testimony in the following ways:

Delivery Method	Date and Delivery Method
Uploaded to the SOAH Document System	11/15/17 at 4:40 p.m. (Exhibit "B")
Sent copies by FedEx to PUC Filing Clerk	11/15/17 – delivered 11/16/17 @9:25 a.m. (signed for by L. Clark) (Exhibit "C")
Faxed to SOAH file clerk, counsel for PUC – Alexander Petak, and counsel for Quadvest Tammy Shea	11/15/17 at 4:50 p.m. – receipt confirmed (Exhibit "D")
Told by PUC they need additional copies so sent additional 10 copies to PUC Filing Clerk	11/22/17 – delivered 11/27/17 @ 8:49 a.m. By FedEx (signed for by L. Clark) (Exhibit "E")

Recently, after receiving Quadvest's Motion to Strike and speaking to the PUC, Complainants filed Complainants' testimony again, in the PUC Interchange. (Exhibit "F")

Request for Leave – If Necessary

Complainants attempted to properly comply with the procedural rules and timely file Complainants' testimony. Based on Complainants' counsel's reading of the rules, Complainants believe the testimony was timely filed. However, if it was not timely filed, Complainants apologize to the Judge and respectfully request leave to file the testimony after the deadline.

Every party timely received Complainants' testimony and the PUC did not file an objection.

Quadvest is Not Prejudiced

Quadvest received Complainants' testimony on the date the testimony was due. Quadvest did not even argue it was prejudiced by the alleged improper filing of the testimony. Instead, Quadvest wants to strike testimony because it was not timely uploaded into the PUC system – even though Quadvest already had the testimony in its possession.

If there is some prejudice to Quadvest, Complainants are willing to extend any deadlines to accommodate Quadvest and alleviate and alleged prejudice.

Quadvest Has No Standing to Object to the Timeliness of PUC's Discovery Requests

Complainants also filed responses to the PUC's requests for information. For some reason, Quadvest objected to the timeliness of these responses even though they were sent by the PUC, not Quadvest. The PUC had not lodged any objections to the timeliness of the responses.

CONCLUSION

For these reasons, Complainants respectfully request the PUC overrule Quadvest's objections and deny Quadvest's Motion to Strike Complainants' testimony.

Respectfully Submitted,
HANSZEN LAPORTE, LLP

By: /s/ Daniel R. Dutko
Daniel R. Dutko
SBN: 24054206
14201 Memorial Dr.
Houston, Texas 77079
(713) 522-9444 phone
(713) 524-2580 fax
ddutko@hanszenlaporte.com
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 29th 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

SOAH DOCKET NO. 473-17-3320.WS

Docket No. 46439

RECEIVED

2017 NOV 27 AM 11:49

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
PUBLIC UTILITY COMMISSION
ADMINISTRATIVE HEARINGS

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' INITIAL TESTIMONY

Attached as Exhibits "A" through "I", are affidavits which comprise Complainants' initial testimony. Should further testimony be necessary, Complainants reserve the right to supplement this testimony.

Respectfully Submitted,

HANSZEN LAPORTE, LLP

By: /s/ Daniel R. Dutko

Daniel R. Dutko

SBN: 24054206

14201 Memorial Dr.

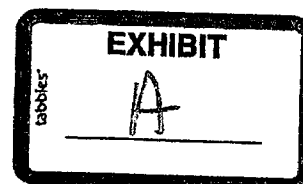
Houston, Texas 77079

(713) 522-9444 phone

(713) 524-2580 fax

ddutko@hanszenlaporte.com

Attorneys for Complainants



SOAH DOCKET NO. 473-17-3320,WS
Docket No. 46439

COMPLAINT OF WES ANDERSON, et	§	BEFORE THE STATE OFFICE OF
al., against QUADVEST LP, QUADVEST	§	
INC., RANCH UTILITIES CORP., and	§	ADMINISTRATIVE HEARINGS
RANCH UTILITIES, L.P.	§	

SOAH DOCKET NO. 473-17-5772,WS
Docket No. 47279

COMPLAINT OF WES ANDERSON, et	§	BEFORE THE STATE OFFICE OF
al., against QUADVEST LP, QUADVEST	§	
INC., RANCH UTILITIES CORP., and	§	ADMINISTRATIVE HEARINGS
RANCH UTILITIES, L.P.	§	

AFFIDAVIT OF GAIL STEPHENS ACEBO

STATE OF TEXAS	§	
	§	KNOW ALL MEN BY THESE PRESENTS
COUNTY OF HARRIS	§	

BEFORE ME, the undersigned authority on this day personally appeared Gail Stephens Acebo, who, after being duly sworn, upon his oath stated:

1. "My name is Gail Stephens Acebo. I am over the age of twenty-one (21), of sound mind, and am capable of making this affidavit. I have personal knowledge of the matters stated in this affidavit, and they are true and correct.
2. I moved into 10614 Serenity Sound, Magnolia, Texas 77354, around nine (9) years ago. I have used Quadvest for my water service since I moved in nine years ago. In roughly June of 2016 my water bill and water usage quadrupled for no reason. I was later told that Quadvest installed smart meters. They did not inform me that they were going to change the water meters. I was never given the opportunity to determine the accuracy of the new meter, because Quadvest never told me it was going to be installed.

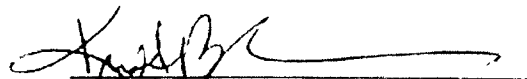
3. During my entire time at our home, we never dramatically increased our water usage. The irrigation system runs three times a week, all year long, no matter the time of year. During the time Quadvest claimed we increased our water usage, we were actually using much less water because my husband was sick and often not in the house.
4. Quadvest made numerous excuses about why our water bill increased so dramatically. They claimed we must have leaks, which we did not. They also claimed they were averaging, which turned out to not be true.
5. Quadvest overcharged us and then lied to us about why our bills were so high.
6. My house is on 1 acre, and the yard and flowerbeds are approximately 36,000 square feet which doesn't include any concrete or home. We do not have a pool. The irrigation system is run 3 times a week depending upon rainfall."

Further affiant sayeth not.


Gail Stephens Acebo

SUBSCRIBED AND SWORN TO BEFORE ME on this the 10th day of November, 2017, to certify which, witness my hand and seal of office.




Notary Public In and For
The State of Texas
My Commission Expires: 2/17/19

SOAH DOCKET NO. 473-17-3326.WS
Docket No. 46439

COMPLAINT OF WES ANDERSON, et al., § BEFORE THE STATE OFFICE OF
against QUADVEST LP, QUADVEST INC., §
RANCH UTILITIES CORP., and RANCH § ADMINISTRATIVE HEARINGS
UTILITIES, L.P. §

SOAH DOCKET NO. 473-17-3772.WS
Docket No. 47279

COMPLAINT OF WES ANDERSON, et al., § BEFORE THE STATE OFFICE OF
against QUADVEST LP, QUADVEST INC., §
RANCH UTILITIES CORP., and RANCH § ADMINISTRATIVE HEARINGS
UTILITIES, L.P. §

AFFIDAVIT OF ETHEL BARRETT

STATE OF TEXAS §
§ KNOW ALL MEN BY THESE PRESENTS
COUNTY OF HARRIS §

BEFORE ME, the undersigned authority on this day personally appeared Ethel Barrett, who, after being duly sworn, upon his oath stated:

1. "My name is Ethel Barrett. I am over the age of twenty-one (21), of sound mind, and am capable of making this affidavit. I have personal knowledge of the matters stated in this affidavit, and they are true and correct.
2. I moved into 11018 Lake Windcrest, Magnolia, Texas 77354 in October 2006. I set up my water service with Quadvest as soon as we moved into our house. In the summer of 2016, immediately after Quadvest installed the smart meters, our bills increased dramatically. Our water usage increased from less than 20,000 gallons to more than 60,000 gallons. I was never given the opportunity to determine the accuracy of the new meter.
3. During the time our water bills increased so dramatically we were not using any more water than normal and during some of that time we were using less water because our irrigation system was broken.
4. Our lot is almost 3 acres, but most of it is wooded. We only irrigate around one acre and our irrigation system waters three times a week. We do have a pool, but no fountains."


Further affiant sayeth not.


Ethel Barrett

11/14/17

SUBSCRIBED AND SWORN TO BEFORE ME on this the 14th day of November, 2017, to certify which, witness my hand and seal of office.




Notary Public In and For
The State of Texas

My Commission Expires: 2/17/19

SOAH DOCKET NO. 473-17-3324.WB
Docket No. 46439

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

BEFORE THE STATE OFFICE OF
ADMINISTRATIVE HEARINGS

SOAH DOCKET NO. 473-17-5772.WB
Docket No. 47279

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

BEFORE THE STATE OFFICE OF
ADMINISTRATIVE HEARINGS

AFFIDAVIT OF MARY ERATO

STATE OF TEXAS
COUNTY OF HARRIS

KNOW ALL MEN BY THESE PRESENTS

BEFORE ME, the undersigned authority on this day personally appeared Mary Erato, who,
after being duly sworn, upon his oath stated:

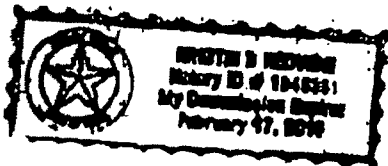
- 1. My name is Mary Erato. I am over the age of twenty-one (21), of sound mind, and am capable of making this affidavit. I have personal knowledge of the matters stated in this affidavit, and they are true and correct.**
- 2. I moved into 32643 Green Bend Court, Magnolia, Texas 77354 in June of 2014. I set up my water service with Quadvest when I moved into the home. In the summer of 2016, my water bill increased dramatically after they installed the smart meters.**
- 3. Quadvest tried to blame the increase on the irrigation system, but we do not use the automatic irrigation system. Next they blamed it on a leak and recommended calling a plumber. We did not have a leak.**
- 4. From 2014 through 2016 we did not increase our water usage.**

5. Our lot is 1.8 acres. We have a pool but no fountain. We have an auto irrigation system but it is not used. Instead we water the grass manually and very infrequently.

Further affiant sayeth not.

Mary Erato
Mary Erato

SUBSCRIBED AND SWORN TO BEFORE ME on this the 14 day of November, 2017, to certify which, witness my hand and seal of office.



Kristin S. Meadows
Notary Public in and For
The State of Texas
My Commission Expires: 2/27/19

SOAH DOCKET NO: 473-17-3320.WB
Docket No. 44489.

COMPLAINT OF WES ANDERSON, et al., § BEFORE THE STATE OFFICE OF
against QUADVEST LP, QUADVEST INC., §
RANCH UTILITIES CORP., and RANCH § ADMINISTRATIVE HEARINGS
UTILITIES, L.P. §

SOAH DOCKET NO: 473-17-5772.WB
Docket No. 47279

COMPLAINT OF WES ANDERSON, et al., § BEFORE THE STATE OFFICE OF
against QUADVEST LP, QUADVEST INC., §
RANCH UTILITIES CORP., and RANCH § ADMINISTRATIVE HEARINGS
UTILITIES, L.P. §

AFFIDAVIT OF GLADYS FLOYD

STATE OF TEXAS. §
§ KNOW ALL MEN BY THESE PRESENTS
COUNTY OF HARRIS. §

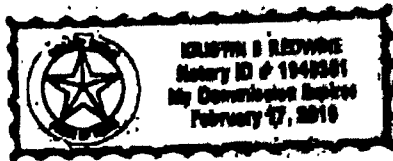
BEFORE ME, the undersigned authority on this day personally appeared Gladys Floyd,
who, after being duly sworn, upon his oath stated:

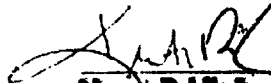
1. "My name is Gladys Floyd. I am over the age of twenty-one (21), of sound mind, and
am capable of making this affidavit. I have personal knowledge of the matters stated in
this affidavit, and they are true and correct.
2. I moved into 20128 Cliffhanger Circle, Magnolia, Texas 77354 in 2000. I set up my water
service with Quadvest when I moved in.
3. In summer of 2016, my water bill doubled for no reason. Leading up to that time, and
during that time, we did not increase our water usage in any way.
4. We live on 2 acres but only half of that is irrigated. At the time Quadvest increased our
water bill, we were watering every 2 to 3 days. We have no pools or sprinklers."

Further affirm as per not.


Gladys Floyd

SUBSCRIBED AND SWORN TO BEFORE ME on this the 12th day of November, 2017, to certify which, witness my hand and seal of office.





Notary Public In and For
The State of Texas
My Commission Expires: 2/17/19

SOAH DOCKET NO. 47-1-17-3328.WS

Docket No. 46-39

COMPLAINT OF WES ANDERSON, et al.,	§	BEFORE THE STATE OFFICE OF
against QUADVEST LP, QUADVEST INC.,	§	
RANCH UTILITIES CORP., and RANCH	§	ADMINISTRATIVE HEARINGS
UTILITIES, L.P.	§	

SOAH DOCKET NO. 47-1-17-5772.WS

Docket No. 47-79

COMPLAINT OF WES ANDERSON, et al.,	§	BEFORE THE STATE OFFICE OF
against QUADVEST LP, QUADVEST INC.,	§	
RANCH UTILITIES CORP., and RANCH	§	ADMINISTRATIVE HEARINGS
UTILITIES, L.P.	§	

AFFIDAVIT OF PAUL GARDAPHE

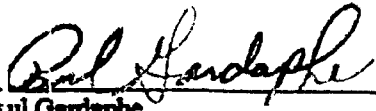
STATE OF TEXAS	§	
	§	KNOW ALL MEN BY THESE PRESENTS
COUNTY OF HARRIS	§	

BEFORE ME, the undersigned authority on this day personally appeared Paul Gardaphe, who, after being duly sworn, upon his oath stated:

1. "My name is Paul Gardaphe. I am over the age of twenty-one (21), of sound mind, and am capable of making this affidavit. I have personal knowledge of the matters stated in this affidavit, and they are true and correct.
2. I moved into 9335 Clubhouse Circle, Magnolia, Texas 77354 in November of 2013. I set up my water service with Quadvest when I moved into my house. In the summer of 2016, after they installed the smart meter, my water bills went up dramatically. I was never given the opportunity to determine the accuracy of the new meter but I did take a picture of it.
3. From the date I moved in through 2016 our household did not increase our water usage in any way.

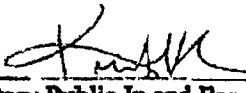
4. Our lot is two acres, we have a pool, a fountain, and an irrigation system. We use the irrigation system sparingly, depending on whether we need it. In 2016, we did not need to use the irrigation system much because we had so much rain that year.

Further affiant sayeth not.


Paul Gardaphe

SUBSCRIBED AND SWORN TO BEFORE ME on this the 9th day of November, 2017, to certify which, witness my hand and seal of office.




Notary Public In and For
The State of Texas
My Commission Expires: 2/17/19

SOAH DOCKET NO. 473-17-3328.WS
Docket No. 46439

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

BEFORE THE STATE OFFICE OF
ADMINISTRATIVE HEARINGS

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.

BEFORE THE STATE OFFICE OF
ADMINISTRATIVE HEARINGS

AFFIDAVIT OF RANDOLPH HANSEN

STATE OF TEXAS

COUNTY OF HARRIS

KNOW ALL MEN BY THESE PRESENTS

BEFORE ME, the undersigned authority on this day personally appeared Randolph Hansen, who, after being duly sworn, upon his oath stated:

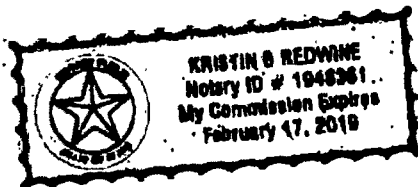
1. "My name is Randolph Hansen. I am over the age of twenty-one (21), of sound mind, and am capable of making this affidavit. I have personal knowledge of the matters stated in this affidavit, and they are true and correct.
2. I moved into 10314 Serenity Sound, Magnolia, Texas 77354 in December of 2015. I set up my water service with Quadvest when I moved into the house. In the summer of 2016, my water usage increased dramatically even though we did not use any more water than normal.
3. I never received notice that Quadvest was changing out the water meters. I was never given the opportunity to determine the accuracy of the new meter, because Quadvest never told me it was going to be installed.

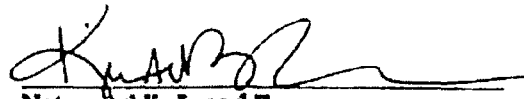
4. Our lot is 2 acres and we have an irrigation system that waters twice a week. We have no pool or fountains."

Further affiant sayeth not.


Randolph Hansen

SUBSCRIBED AND SWORN TO BEFORE ME on this the 10th day of November, 2017, to certify which, witness my hand and seal of office.




Notary Public In and For
The State of Texas

My Commission Expires: 2/17/19

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

COMPLAINT OF WES ANDERSON, et al., against QUADVEST LP, QUADVEST INC., RANCH UTILITIES CORP., and RANCH UTILITIES, L.P.	§ § § §	BEFORE THE STATE OFFICE OF ADMINISTRATIVE HEARINGS
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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.	§ § § §	BEFORE THE STATE OFFICE OF ADMINISTRATIVE HEARINGS
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AFFIDAVIT OF MARTIN LEO

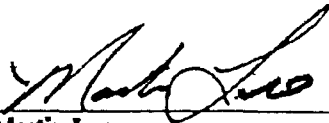
STATE OF TEXAS	§	
	§	
COUNTY OF HARRIS	§	KNOW ALL MEN BY THESE PRESENTS

BEFORE ME, the undersigned authority on this day personally appeared Martin Leo, who, after being duly sworn, upon his oath stated:

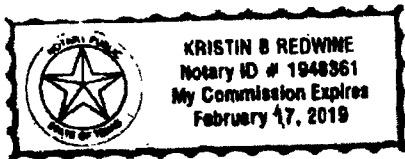
1. "My name is Martin Leo. I am over the age of twenty-one (21), of sound mind, and am capable of making this affidavit. I have personal knowledge of the matters stated in this affidavit, and they are true and correct.
2. I moved into 10411 Serenity Sound, Magnolia, Texas 77354 in 2013. I set up my water service with Quadvest when we moved in. In the summer of 2016, our water bills increased dramatically for no reason. We did not increase our water usage from 2013 through 2016. We had the same number of people in the house the whole time and nothing changed. The only thing that changed was Quadvest's installation of smart meters.

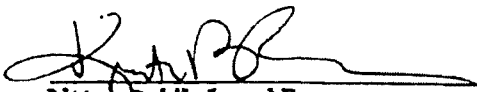
3. After our water bill increased so dramatically, Quadvest blamed it on leaks and then said something must be running in our house. We checked and we did not have any leaks and nothing was left running.
4. Our lot is 2 acres. We have a pool with no fountains. We have an irrigation system that runs 3 days a week but only 7 or 8 months a year."

Further affiant sayeth not.


Martin Leo

SUBSCRIBED AND SWORN TO BEFORE ME on this the 14th day of November, 2017, to certify which, witness my hand and seal of office.




Notary Public In and For
The State of Texas

My Commission Expires: 2/17/19

SOAH DOCKET NO. 473-17-3320.WS
Docket No. 45439

COMPLAINT OF WES ANDERSON, et al.,	§	BEFORE THE STATE OFFICE OF
against QUADVEST LP, QUADVEST INC.,	§	
RANCH UTILITIES CORP., and RANCH	§	ADMINISTRATIVE HEARINGS
UTILITIES, L.P.	§	

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

COMPLAINT OF WES ANDERSON, et al.,	§	BEFORE THE STATE OFFICE OF
against QUADVEST LP, QUADVEST INC.,	§	
RANCH UTILITIES CORP., and RANCH	§	ADMINISTRATIVE HEARINGS
UTILITIES, L.P.	§	

AFFIDAVIT OF JILL WESTBROOK

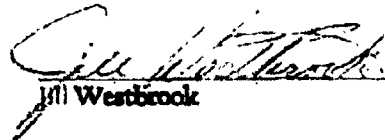
STATE OF TEXAS	§	
	§	KNOW ALL MEN BY THESE PRESENTS
COUNTY OF HARRIS	§	

BEFORE ME, the undersigned authority on this day personally appeared Jill Westbrook, who, after being duly sworn, upon his oath stated:

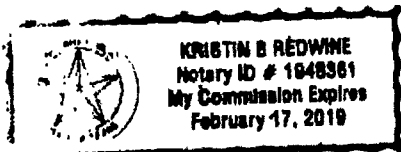
- 1. "My name is Jill Westbrook. I am over the age of twenty-one (21), of sound mind, and am capable of making this affidavit. I have personal knowledge of the matters stated in this affidavit, and they are true and correct.**
- 2. I moved into 9426 Deer Path Lane, Magnolia, Texas 77354 in 2010. I set up my water service with Quadvest when I moved into my house. In the summer of 2016, my water bill went up dramatically for no reason. I did not increase my water usage, in fact, my water usage was down because it had rained so much at that time. My water bill increased only after Quadvest installed smart meters. I never received notice that Quadvest was changing out the water meters. I was never given the opportunity to determine the accuracy of the new meter, because Quadvest never told me it was going to be installed.**
- 3. From 2010 through 2016 my water usage did not increase at our house or in our yard.**


4. When my bill increased dramatically, I called Quadvest and they said I probably had a leak. We checked for leaks and did not have any leaks. Next Quadvest blamed the increased water usage on our irrigation system, even though we barely used the irrigation system at that time because it was raining so much.
5. We have a pool and one fountain (but it recirculates water). Our lot is one acre and we have an irrigation system. We only use the irrigation system occasionally, and then only for 5 minute cycles, three times a week."

Further affiant sayeth not.


Jill Westbrook

SUBSCRIBED AND SWORN TO BEFORE ME on this the 14th day of November, 2017,
to certify which, witness my hand and seal of office.




Notary Public In and For
The State of Texas
My Commission Expires: 2/17/19

Docket No. 46439

COMPLAINT OF WES ANDERSON, et al.,	§	PUBLIC UTILITY COMMISSION
against QUADVEST LP, QUADVEST INC.,	§	
RANCH UTILITIES CORP., and RANCH	§	OF TEXAS
UTILITIES, L.P.	§	

AFFIDAVIT OF STEPHEN J. JONES

STATE OF TEXAS	§	
	§	KNOW ALL MEN BY THESE PRESENTS
COUNTY OF HARRIS	§	

BEFORE ME, the undersigned authority on this day personally appeared Stephen Jones, who, after being duly sworn, upon his oath stated:

1. "My name is Stephen J. Jones. I am over the age of twenty-one (21), of sound mind, and am capable of making this affidavit. I have personal knowledge of the matters stated in this affidavit, and they are true and correct.
2. I moved into 32811 Sawgrass Court on July 1, 2016. I set up my water service with Quadvest in June of 2016 and they did not inform me that they were going to change the water meters. In fact, I never received notice that Quadvest was changing out the water meters. I was never given the opportunity to determine the accuracy of the new meter, because Quadvest never told me it was going to be installed.
3. After the meter was installed, without my knowledge, all of the white clothes we were washing were permanently stained and ruined. I learned later that clothes were stained from the iron in the water that broke loose with the meter change. Quadvest did nothing to replace my clothing.
4. Even though we just moved in and did not use much water, Quadvest sent us a bill alleging we used 99,000 gallons of water in July of 2016. My family has never used

anywhere near 99,000 gallons of water in a month. In July of 2016 we did not even use our sprinkler system the first two weeks of the month as we had roofers working in the yard and the sprinkler system was completely off during that time.

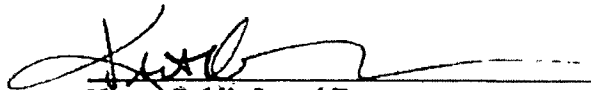
5. Quadvest ignored my requests to substantiate my alleged use of 99,000 gallons of water. I have never been given an opportunity to confirm the accuracy of the new meter.
6. Quadvest later changed the meter out again. Again, my clothing was stained because Quadvest failed to give us proper notice"

Further affiant sayeth not.



Stephen J. Jones

SUBSCRIBED AND SWORN TO BEFORE ME on this the 12th day of July, 2017, to certify which, witness my hand and seal of office.



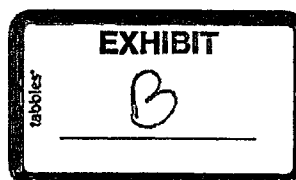
Notary Public In and For
The State of Texas

My Commission Expires: 2/17/19

Kristin Redwine

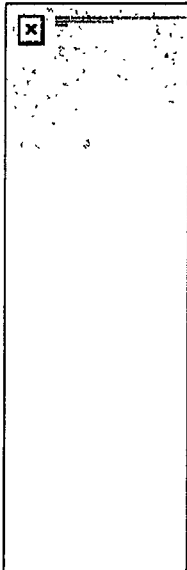
From: webupload@soah.state.tx.us
Sent: Wednesday, November 15, 2017 4:41 PM
To: Kristin Redwine
Subject: SOAH Document Upload System - Upload Notification

Successfully Transferred Files
Complainants' Testimony.pdf --- 5.431 MB --- Time:11/15/17 16:40:53.12
Total: 1 files
Files Deleted: None
Total Time taken: 0.15 minutes



Kristin Redwine

From: TrackingUpdates@fedex.com
Sent: Thursday, November 16, 2017 9:29 AM
To: Kristin Redwine
Subject: FedEx Shipment 770761942740 Delivered



Your package has been delivered

Tracking # 770761942740

Ship date:
Wed, 11/15/2017

Daniel R. Dutko
Hanszen Laporte
HOUSTON, TX 77079
US

Delivery date:
Thu, 11/16/2017
9:25 am

Attn: **FILING CLERK**
Public Utility Commission
of Texas
1701 N. Congress Ave.
AUSTIN, TX 78711
US

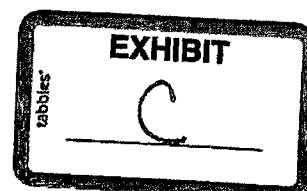


Delivered

Shipment Facts

Our records indicate that the following package has been delivered.

Tracking number:	<u>770761942740</u>
Status:	Delivered: 11/16/2017 09:25 AM Signed for By: L.CLARK
Reference:	Quadvest
Signed for by:	L.CLARK
Delivery location:	AUSTIN, TX
Delivered to:	Mailroom
Service type:	FedEx Standard Overnight
Packaging type:	FedEx Pak
Number of pieces:	1
Weight:	2.00 lb.
Special handling/Services:	Deliver Weekday



Standard transit:

11/16/2017 by 3:00
pm

☐ Please do not respond to this message. This email was sent from an unattended mailbox. This report was generated at approximately 9:29 AM CST on 11/16/2017.

All weights are estimated.

To track the latest status of your shipment, click on the tracking number above.

Standard transit is the date and time the package is scheduled to be delivered by, based on the selected service, destination and ship date. Limitations and exceptions may apply. Please see the FedEx Service Guide for terms and conditions of service, including the FedEx Money-Back Guarantee, or contact your FedEx Customer Support representative.

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Thank you for your business.

Kristin Redwine

From: RingCentral <service@ringcentral.com>
Sent: Wednesday, November 15, 2017 4:53 PM
To: Jill Walley; Rita Diamond; Kristin Redwine
Subject: Fax Message Transmission Result - All Sent

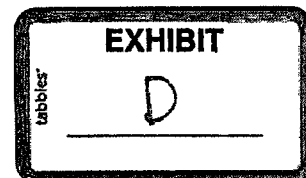
Fax Transmission Results

Here are the results of the 23-page fax you sent from your phone number (888) 768-5701:

Name	Phone Number	Date and Time	Result
5123222061@rcfax.com	+1 (512) 3222061	Wednesday, November 15, 2017 at 04:51 PM	Sent
8322143905@rcfax.com	+1 (832) 2143905	Wednesday, November 15, 2017 at 04:53 PM	Sent
5129367268@rcfax.com	+1 (512) 9367268	Wednesday, November 15, 2017 at 04:50 PM	Sent

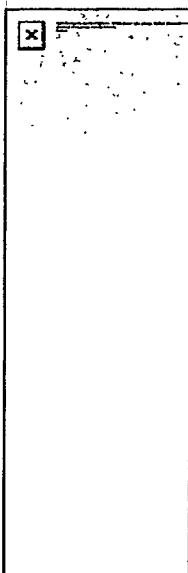
Your fax(es) included the following file(s), which were rendered into fax format for transmission:

File Name	Result
image001.gif	Success
SOAH - Filing Complainants' Testimony.pdf	Success



Kristin Redwine

From: TrackingUpdates@fedex.com
Sent: Monday, November 27, 2017 8:53 AM
To: Kristin Redwine
Subject: FedEx Shipment 770816016613 Delivered



Your package has been delivered

Tracking # 770816016613

Ship date:
Wed, 11/22/2017

Daniel R. Dutko
Hanszen Laporte
HOUSTON, TX 77079
US

Delivery date:
Mon, 11/27/2017
8:49 am

Attn: FILING CLERK
Public Utility Commission
of Texas
1701 N. Congress Ave.
AUSTIN, TX 78711
US



Delivered

Shipment Facts

Our records indicate that the following package has been delivered.

Tracking number: 770816016613

Status: Delivered:
11/27/2017 08:49 AM
Signed for By:
L.CLARK

Reference: Quadvest

Signed for by: L.CLARK

Delivery location: AUSTIN, TX

Delivered to: Mailroom

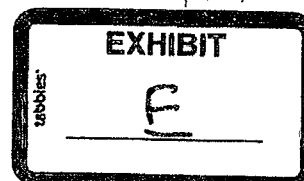
Service type: FedEx Standard
Overnight

Packaging type: FedEx Pak

Number of pieces: 1

Weight: 2.00 lb.

Special handling/Services: Deliver Weekday



Standard transit: 11/27/2017 by 3:00
pm

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Thank you for your business.

Interchange Filer

Filing Submitted

✓ Filing Complete

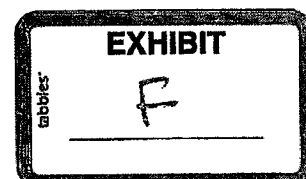
Next Steps:

You have completed the electronic portion of your filing, however, in order for the PUC to be able to process your filing, you must submit this tracking number with your paper copies. You may print and include this page or the confirmation email you received. For any questions about the number of copies, please see the following page: <http://www.puc.texas.gov/industry/filings/FilingProceed.aspx> (<http://www.puc.texas.gov/industry/filings/FilingProceed.aspx>)

Central Records: (512) 936-7180

Tracking Number: CLYXIASK

Filing 11/29/2017 11:57:17 AM
Submitted
on



Control Number 47279 FILED 06/01/17) COMPLAINT OF WEST ANDERSON, ET AL AGAINST QUADVEST LP, QUADVEST INC., RANCH UTILITIES CORP., AND RANCH UTILITIES, L.P.

Filing Party WES ANDERSON, ET. AL

Filing Type TESTIMONY

Description Complainants' Initial Testimony

Documents Complainants' Testimony.pdf

Addendum Included No

Submitted By Daniel R. Dutko
14201 Memorial Dr.
Houston, TX 77079
(713) 522-9444
ddutko@hanszenlaporte.com
(mailto:ddutko@hanszenlaporte.com)

An email confirmation has been sent to ddutko@hanszenlaporte.com. Please check your spam/junk folders.

Start a New filing (/filer/controlnumber/?Length=5)

Interchange Filer

Filing Submitted

✓ Filing Complete

Next Steps:

You have completed the electronic portion of your filing, however, in order for the PUC to be able to process your filing, you must submit this tracking number with your paper copies. You may print and include this page or the confirmation email you received. For any questions about the number of copies, please see the following page: <http://www.puc.texas.gov/industry/filings/FilingProceed.aspx> (<http://www.puc.texas.gov/industry/filings/FilingProceed.aspx>)

Central Records: (512) 936-7180

Tracking Number: ULVCFUQR

Filing 11/29/2017 11:55:46 AM
Submitted
on

Control Number	46439	COMPLAINT OF WES ANDERSON, ET. AL. AGAINST QUADVEST L.P., QUADVEST, INC., RANCH UTILITIES CORP., AND RANCH UTILITIES, L.P.
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Filing Party	WES ANDERSON, ET. AL
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Filing Type	TESTIMONY
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Description	Complainants' Initial Testimony
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Documents	Complainants' Testimony.pdf
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Addendum Included	No
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Submitted By	Daniel R. Dutko 14201 Memorial Dr. Houston, TX 77079 (713) 522-9444 ddutko@hanszenlaporte.com (mailto:ddutko@hanszenlaporte.com)
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An email confirmation has been sent to ddutko@hanszenlaporte.com. Please check your spam/junk folders.

Start a New filing (/filer/controlnumber/?Length=5)

