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PUBLIC UTILITY COMMISSION
FILING CLERK

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

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
§

SOAH DOCKET NO. 473-7-3320
PUC DOCKET NO. 46439

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 LIST OF ISSUES

Quadvest L.P., Quadvest, Inc. Ranch Utilities Corp., and Ranch Utilities, L.P. (collectively "Quadvest") file this List of Issues and, in support thereof, respectfully show as follows:

Background

The Complainants at issue in Docket 47279 originally filed their complaint in Docket 46439 on October 14, 2017. On December 2, 2017, the Commission issued Order No. 2 in Docket 46439, dismissing these Complainants for failure to exhaust their administrative remedies. One individual complaint remained in Docket 46439--Stephen Jones. On June 1, 2017, Complainants refiled their complaint in Docket 47279. On August 7, 2017, the Commission issued Order No. 3 in Docket 47279, dismissing all but twelve of the original Complainants for again failing to exhaust administrative remedies.

On September 5, 2017, the Administrative Law Judge ("ALJ") issued Order No. 1 consolidating Docket 46439 and Docket 47279. On August 23, 2017, the Commission issued its Order of Referral in Docket 47279, requiring that the parties file a list of issues to be addressed in this docket by September 8, 2017. Because the Commission has already issued Preliminary Order in Docket 46439, and Docket 46439 and 47279 have now been consolidated, Quadvest recommends that the Commission assign the same list of issues for Docket 47279. Consistent with

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the issues to be addressed in Docket 46439, Quadvest recommends the following issues to be addressed:

1. Did Quadvest test Complainants' meter after installation? If so, what was the result?
2. Are Complainants' meters properly reading usage?
3. Did the tests performed by the manufacturer establish the accuracy of Complainants' meters prior to installation in accordance with 16 TAC § 24.89(f)? What were the results of any tests conducted by the manufacturer on the smart meter at Complainants' residence?
4. If Complainants' meters are not properly reading usage, what is the proper bill adjustment to be made, including any appropriate refund, in accordance with 16 TAC § 24.89?
5. What is the Commission-approved pass-through fee under Quadvest's Tariff?
6. Is Quadvest correctly billing Complainants for its Commission approved pass-through fee?
7. If Quadvest is not correctly billing Complainants for its Commission-approved pass-through fee, what is the proper bill adjustment to be made, including any appropriate refund, in accordance with 16 TAC § 24.87?

Respectfully submitted,

By: 

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ATTORNEYS FOR QUADVEST

CERTIFICATE OF SERVICE

I hereby certify that a true and correct copy of the foregoing document was served on all parties of record in this proceeding on this the 8th day of September, 2017, by facsimile, electronic mail, U.S. first-class mail, postage prepaid, or by hand delivery.



Tammy Wavle-Shea