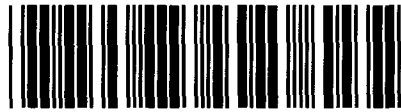


Control Number: 47279



Item Number: 34

Addendum StartPage: 0

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

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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. §

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

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 15th 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

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

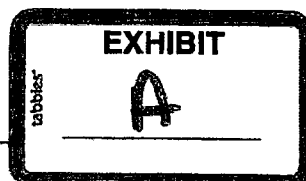
COMPLAINT OF WES ANDERSON, et	§	BEFORE THE STATE OFFICE OF
al., against QUADVEST LP, QUADVEST	§	
INC., RANCH UTILITIES CORP., and	§	ADMINISTRATIVE HEARINGS
RANCH UTILITIES, L.P.	§	

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.

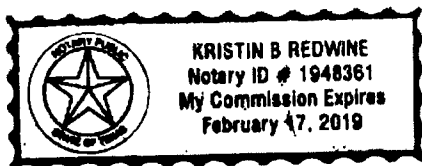



3. During my entire time at our home, we never dramatically increased our water usage. The irrigation system runs three times a week, all year long, no matter the time of year. During the time Quadvest claimed we increased our water usage, we were actually using much less water because my husband was 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. 473-17-3320.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. 473-17-5772.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 ETHEL BARRETT

STATE OF TEXAS

§

§ KNOW ALL MEN BY THESE PRESENTS

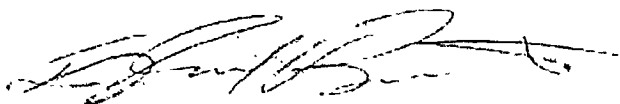
COUNTY OF HARRIS

§

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

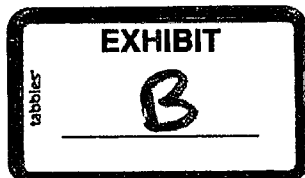
- 1. "My name is Ethel Barrett. I am over the age of twenty-one (21), of sound mind, and am capable of making this affidavit. I have personal knowledge of the matters stated in this affidavit, and they are true and correct.**
- 2. "I moved into 11018 Lake Windcrest, Magnolia, Texas 77354 in October 2006. 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.




11/14/17

Ethel Barrett



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, L.P.**

**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, L.P.**

**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 32543 Green Bend Court, Magnolia, Texas 77354 in June of 2014. I set up my water service with Quadvest when I moved into the house. 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.**

EXHIBIT

tabbies

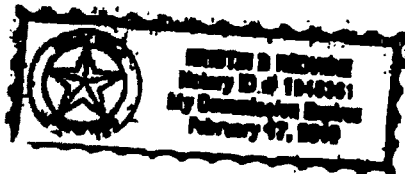
C

5. Our lot is 1.8 acres. We have a pond 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.



[Signature]
Notary Public In and For
The State of Texas

My Commission Expires: 2/7/19

BOAH DOCKET NO: 473-17-3328.WB

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
§

BOAH 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, L.P.

§ BEFORE THE STATE OFFICE OF
§
§ ADMINISTRATIVE HEARINGS
§

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 16118 Clubhouse 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 fountains."

Further affiant sayeth not.

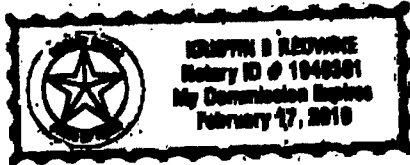

Gladys Floyd

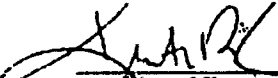
EXHIBIT

tabbies

D

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. 47.1-17-3320.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

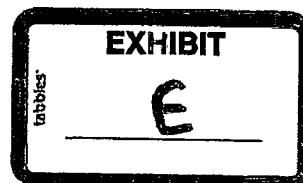
COMPLAINT OF WES ANDERSON, et al.,	§	BEFORE THE STATE OFFICE OF
against QUADVEST LP, QUADVEST INC.,	§	
RANCH UTILITIES CORP., and RANCH	§	ADMINISTRATIVE HEARINGS
UTILITIES, L.P.	§	

AFFIDAVIT OF PAUL GARDAPHE

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

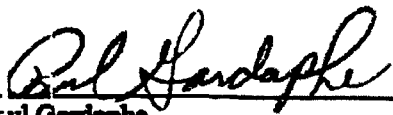
BEFORE ME, the undersigned authority on this day personally appeared Paul Gardaphe, who, after being duly sworn, upon his oath stated:

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.



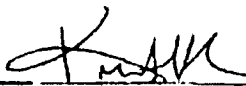
4. Our lot is two acres, we have a pool, a fountain, and an irrigation system. We use the irrigation system sparingly, depending on whether we need it. In 2016, we did not need to use the irrigation system much because we had so much rain that year.

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. 473-17-3320.WS
Docket No. 46439

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

AFFIDAVIT OF RANDOLPH HANSEN

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

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.



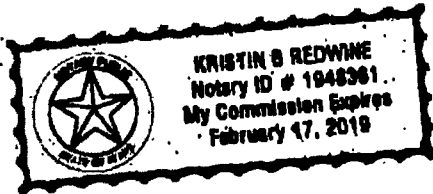
4. Our lot is 2 acres and we have an irrigation system that waters twice a week. We have no pool or fountains."

Further affiant sayeth not.



Randolph Hansen

SUBSCRIBED AND SWORN TO BEFORE ME on this the 16th 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.,	§	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

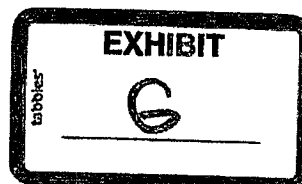
COMPLAINT OF WES ANDERSON, et al.,	§	BEFORE THE STATE OFFICE OF
against QUADVEST LP, QUADVEST INC.,	§	
RANCH UTILITIES CORP., and RANCH	§	ADMINISTRATIVE HEARINGS
UTILITIES, L.P.	§	

AFFIDAVIT OF MARTIN LEO

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

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.

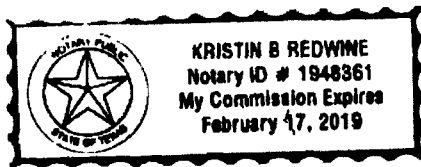



3. After our water bill increased so dramatically, Quadvest blamed it on leaks and then said something must be running in our house. We checked and we did not have any leaks and nothing was left running.
4. Our lot is 2 acres. We have a pool with no fountains. We have an irrigation system that runs 3 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. 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. 473-17-5772.WS
Docket No. 47279

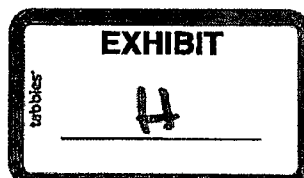
COMPLAINT OF WES ANDERSON, et al., § BEFORE THE STATE OFFICE OF
against QUADVEST LP, QUADVEST INC., §
RANCH UTILITIES CORP., and RANCH § ADMINISTRATIVE HEARINGS
UTILITIES, L.P. §

AFFIDAVIT OF JILL WESTBROOK

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

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.

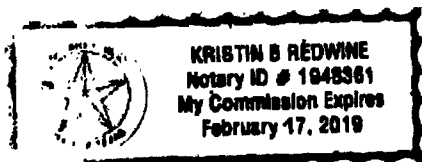



4. When my bill increased dramatically, I called Quadvest and they said I probably had a leak. We checked for leaks and did not have any leaks. Next Quadvest blamed the increased water usage on our irrigation system, even though we barely used the irrigation system at that time because it was raining 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

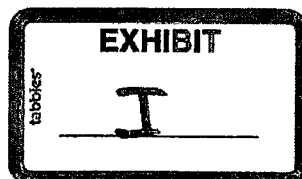
COMPLAINT OF WES ANDERSON, et al., § PUBLIC UTILITY COMMISSION
against QUADVEST LP, QUADVEST INC., §
RANCH UTILITIES CORP., and RANCH § OF TEXAS
UTILITIES, L.P. §

AFFIDAVIT OF STEPHEN J. JONES

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

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.

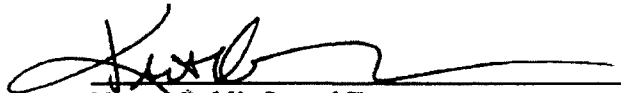
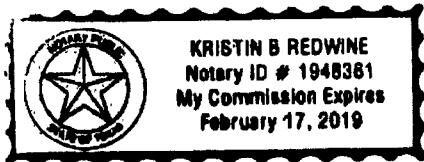
5. Quadvest ignored my requests to substantiate my alleged use of 99,000 gallons of water. I have never been given an opportunity to confirm the accuracy of the new meter.
6. Quadvest later changed the meter out again. Again, my clothing was stained because Quadvest failed to give us proper notice"

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