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SOAH DOCKET NO. 473-17-3320.WS

Docket No. 46439

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PUBLIC UTILITY COMMISSION
HEARING CLERK

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

“DOCKET 47279 PLAINTIFFS” RESPONSES TO QUADVEST’S FIRST REQUEST FOR
INFORMATION QUESTION NOS. 1-1 THROUGH 1-22

TO: QUADVEST, LP, QUADVEST, INC., RANCH UTILITIES CORP and RANCH
UTILITIES, L.P., by and through their attorney of record, Tammy Wavle Shea, Cozen
O’Connor, 1221 McKinney, Suite 2900, Houston, Texas 77010.

COME NOW, Complainants WES ANDERSON, ET AL., and files this response to
Quadvest L.P., Quadvest, Inc., Ranch Utilities Corp. and Ranch Utilities, Inc.’s (“Quadvest”) First
Request for Information to “Docket 47279 Plaintiffs”, Question numbers 1-1 through 1-22.
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

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Attorneys for Complainants

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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 5th day of December, 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 FIRST REQUEST FOR INFORMATION

1-1 Admit or deny that the size of the lot at 19818 Black Cherry Bend Ct. is 7050 square feet according to Harris County Appraisal District Records.

ANSWER: Complainant objects because this request is vague and confusing. Subject to these objections, Complainant can neither admit nor deny what the Harris County Appraisal District Records say.

1-2 Admit or deny that you do not dispute that the size of the lot at 19818 Black Cherry Bend Ct. is 7050 square feet.

ANSWER: Admit – although I believe the lot was 7150 sq. ft., but I could be wrong.

1-3 If you deny the previous request, state the basis for your denial and indicate the size of the lot at 19818 Black Cherry Bend Ct, in square feet, that you believe is accurate.

ANSWER: Complainant does not remember the exact size the lot at 19818 Black Cherry Bend Ct. but believes the lot was 7150 sq. ft.

1-4 Was there a sprinkler system at 19818 Black Cherry Bend Ct. during the time that you resided there? If so, identify the sprinkler system, the number of zones, the number of sprinkler heads, the normal duration of irrigation for each zone and the frequency of irrigation (days per month and number of times per day).

ANSWER: Yes, there was a sprinkler system. Complainant does not remember the identity of the sprinkler system, the number of zones, the number of sprinkler heads, the normal duration of irrigation for each zone and the frequency of irrigation

1-5 What time of day do you normally use your irrigation system at 32811 Sawgrass Ct to water your lawn? From when to when?

ANSWER: When I use it, I use it twice a day Monday-Wednesday-Friday, 15 minutes.

1-6 Does your irrigation system at 32811 Sawgrass Ct have a rain sensing device?

ANSWER: Yes.

1-7 How many square feet is your home located at 32811 Sawgrass Ct.?

ANSWER: 2750 sq. ft.

1-8 How many bathrooms are there in your home located at 32811 Sawgrass Ct.?

ANSWER: 3.

1-9 How many people live in the home at 32811 Sawgrass Ct.?

ANSWER: 2

1-10 Are there school age children living in the home at 32811 Sawgrass Ct.?

ANSWER: No.

1-11 Do you have horses or livestock at 32811 Sawgrass Ct.?

ANSWER: No.

1-12 Do you have low flow (water saving) fixtures installed in your home located at 32811 Sawgrass Ct.?

ANSWER: Yes, shower heads and commodes.

1-13 Identify the size of the lot located at 19818 Black Cherry Bend Ct.

ANSWER: 7150 sq. ft.

1-14 Identify the number of water meters located at 19818 Black Cherry Bend Ct.

ANSWER: 1.

1-15 Do you contend that water usage is inaccurate for any time period after August, 2016? If so, state the reasons for your contention and the amount you contend is accurate for each month from September 2016 to the present.

ANSWER: No. The reason the amount is inaccurate is because of the "smart meters" installed by Quadvest. The accurate amounts from September 2016 to the present would be the actual amount of water we used.

1-16 State the water usage that you contend would be accurate for the period July and August 2016.

ANSWER: The accurate amounts of water usage for the period July and August would be the actual amount of water we used.

1-17 Admit that you are not an expert in water meter accuracy.

ANSWER: Complainant objects because this request is vague and confusing. Subject to these objections, Complainant can neither admit nor deny whether a court or the PUC would qualify him as an expert in any field.

1-18 Admit that you are not an expert in water pipe corrosion.

ANSWER: Complainant objects because this request is vague and confusing. Subject to these objections, Complainant can neither admit nor deny whether a court or the PUC would qualify him as an expert in any field.

1-19 Admit that you are not an expert in replacing and installing meters.

ANSWER: Complainant objects because this request is vague and confusing. Subject to these objections, Complainant can neither admit nor deny whether a court or the PUC would qualify him as an expert in any field.

1-20 How many zones does your irrigation system located at 32811 Sawgrass Ct have?

ANSWER: Complainant is not exactly sure how many zones the irrigation system has. When it is run, the system runs every other day, twice a day, 30 heads @ 15 minutes per head, at a rate of .50 gpm.

1-21 How long does each zone run at your irrigation system located at 32811 Sawgrass Ct?

ANSWER: Complainant is not exactly sure how many zones the irrigation system has. When it is run, the system runs every other day, twice a day, 30 heads @ 15 minutes per head, at a rate of .50 gpm.

1-22 Approximately, how many sprinkler heads are in each zone in your irrigation system located at 32811 Sawgrass Ct?

ANSWER: Complainant is not exactly sure how many zones the irrigation system has. When it is run, the system runs every other day, twice a day, 30 heads @ 15 minutes per head, at a rate of .50 gpm.

SUPPORTING WITNESS
for Requests 1-1 through 1-22:

Stephen J. Jones

The foregoing responses to the above requests for information are accurate and complete, and contain 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/ Stephen J. Jones
Stephen J. Jones