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PETITION BY OUT OF DISTRICT §
RATEPAYERS APPEALING THE §
WATER RATES ESTABLISHED BY §
THE EL PASO COUNTY WATER §
CONTROL AND IMPROVEMENT §
DISTRICT NO. 4 §

PUBLIC UTILITY COMMISSION
OF TEXAS
PUBLIC UTILITY COMMISSION
FILING CLERK

**EL PASO COUNTY WATER CONTROL AND IMPROVEMENT DISTRICT NO. 4'S
RESPONSE TO RATEPAYERS' SECOND REQUEST FOR INFORMATION**

NOW COMES El Paso County Water Control and Improvement District No. 4 ("District") and serves its Responses to the Ratepayers' Second Request for Information.

I. WRITTEN RESPONSES

The District's written responses to Ratepayers' Second Request for Information are attached and incorporated by reference. Each response is stated on a separate page on which the request has been restated. The District's responses are made in the spirit of cooperation without waiving the District's right to contest the admissibility of any of these matters at a hearing. Pursuant to P.U.C. PROC. R. 22.144(c)(2)(A), each response lists the preparer and the person under whose direct supervision the response was prepared and any sponsoring witness. Pursuant to P.U.C. PROC. R. 22.144(c)(2)(F), the District stipulates that its responses may be treated by all parties as if they were made under oath.

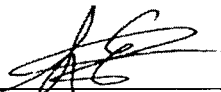
Responding further as to all responses, the District reserves the right to supplement, to amend and/or to modify responses and objections to the information sought. A response to any Request is not a waiver of that right or of any objection raised herein.

Respectfully submitted,

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DISTRICT NO. 4**

CERTIFICATE OF SERVICE

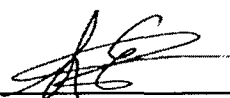
I hereby certify that I have served or will serve a true and correct copy of the foregoing document (including all attachments) via hand delivery, facsimile, electronic mail, overnight mail, U.S. mail and/or Certified Mail/Return-Receipt Requested to counsel for all parties on this 14th day of October, 2019, including:

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Sergio M. Estrada

RESPONSES

QUESTION NO. 1: All models produced, used or relied on by Mr. Evan Loy for statements and tables contained in his affidavit included in the District's Response to the Ratepayers' Motion for Partial Summary Decision and Request for Interim Rates. If possible, please provide in excel format.

RESPONSE: The requested models are not in the possession, custody, or control of the District. The District has not contracted with Mr. Loy to obtain these models in any format.

If and when the District provides its direct testimony in this case, the District may consider entering into an agreement with Mr. Loy to obtain access to such information.

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