



Control Number: 42860



Item Number: 102

Addendum StartPage: 0

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APPLICATION OF DOUGLAS  
UTILITY COMPANY TO CHANGE  
WATER AND SEWER RATE/TARIFF  
IN HARRIS COUNTY, TEXAS

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BEFORE THE STATE OFFICE  
PUBLIC UTILITY COMMISSION  
FILING CLERK

OF

ADMINISTRATIVE HEARINGS

**EQUALITY COMMUNITY HOUSING CORPORATION'S  
RESPONSE TO THE STAFF'S RECOMMENDATION**

Equality Community Housing Corporation ("Equality") files this its Response to the Staff's Recommendation pursuant to SOAH Order No. 16 Adopting Amended Procedural Schedule.

On December 8, 2015, the PUC Staff filed its "Commission Staff's Response to SOAH Order No. 16 & Recommendation on Supplemental Refund Information" (the "Recommendation"). Equality has reviewed the Recommendation and makes the following responses:

1. Equality agrees with the Recommendation insofar as it relates to its refund (referred to in the reports provided by Douglas Utility Company ("DUC") as the refund for "Haverstock").
2. Equality again urges that a schedule be established for the payment of the refund amount, which schedule should extend no more than six months. Equality has been paying for utility services for over two years at the higher rate sought by DUC in the application that it has now withdrawn. Equality should not be forced to suffer further financial damages by waiting for two years to receive its refund as requested by Applicant DUC Utility Company.

102

3. Once the time period for payment of the refund is established and the end date of the refund period is established, the PUC Staff should be directed to complete its calculations through the date of the PUC final order.

**Request for Relief**

Equality supports the Staff's Recommendation and requests that the ALJ order DUC to refund to Equality its owed reimbursements within six months. Equality requests all further relief to which it may be entitled.

Respectfully submitted,

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**ATTORNEYS FOR EQUALITY  
COMMUNITY HOUSING CORPORATION**

## CERTIFICATE OF SERVICE

The undersigned hereby certifies that a true and correct copy of the foregoing document has been served as indicated below upon the following on the 11<sup>th</sup> day of December, 2015.

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