

Control Number: 42860



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SOAH DOCKET NO. 473-14-5410.WS RECEIVED
PUC DOCKET NO. 42860

2015 OCT 13 PM 1:34
PUBLIC UTILITY COMMISSION
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APPLICATION OF DOUGLAS UTILITY §
COMPANY TO CHANGE WATER AND §
SEWER RATE/TARIFF IN HARRIS §
COUNTY, TEXAS §

BEFORE THE STATE OFFICE
OF
ADMINISTRATIVE HEARINGS

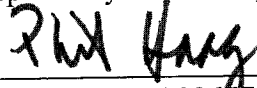
EQUALITY COMMUNITY HOUSING CORPORATION'S
REQUEST FOR INFORMATION TO DOUGLAS UTILITY COMPANY

TO: Douglas Utility Company by and through its attorney of record, Mark Zeppa, 4833 Spicewood Springs Road, Suite 202, Austin, Texas 78759-8436.

Equality Community Housing Corporation ("Equality"), by and through its attorneys and pursuant to 16 TAC § 22.144 of the Public Utility Commission of Texas' ("Commission") Procedural Rules, requests that the Douglas Utility Company ("Douglas") by and through its attorneys of record, provide the following information. Douglas must answer each question separately, fully, in writing, and under oath, upon the law offices of McGinnis Lochridge, 600 Congress Avenue, Suite 2100, Austin, Texas 78701, within twenty (20) days after service or such other time as required by the Administrative Law Judge ("ALJ") in the above referenced matter. These questions are continuing, and require supplementation, under oath, should additional information come available or there is a relevant change in circumstances.

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Respectfully submitted,



Phil Haag (SBN 08657800)

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MCGINNIS LOCHRIDGE

Carl R. Galant (SBN 24050633)

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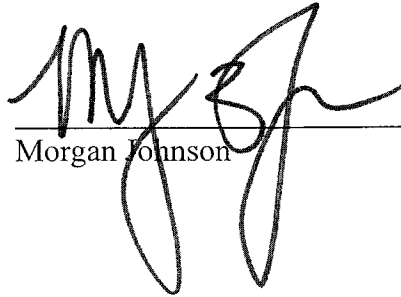
Fax (512) 495-6093

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 13th day of October, 2015.

Mark Zeppa 4833 Spicewood Springs Rd., #202 Austin, TX 78759 512 346-4011 attorney for Douglas Utility Company markzeppa@austin.rr.com mark@zeppalaw.com Attorney for Douglas Utility	Fax: (512) 346-6847 E-mail: markzeppa@austin.twcbc.com
J.J. Smith	E-mail: jjsmith@austin.twcbc.com
Karl E. Wolf Fountainview Homeowners Association 5523 Mendota lane Houston, TX 77032 713-301-7149 kwolffsr@att.net	E-mail: kwolffsr@att.net
Mandeep Chatha Legal Division Public Utility Commission 1701 N. Congress Avenue, Suite 8-110 Austin, TX 78711	Fax: (512) 936-7268 E-mail: mandeep.chatha@puc.texas.gov



A handwritten signature in black ink, appearing to read 'Morgan Johnson', is written over a horizontal line.

Morgan Johnson

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EQUALITY COMMUNITY HOUSING CORPORATION'S
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DEFINITIONS

- A. "Douglas," "the Company" or "you" refers to the Douglas Utility Company and any person acting or purporting to act on their behalf, including without limitation, attorneys, agents, advisors, investigators, representatives, employees, or other persons.
- B. "Document" includes any written, recorded, or graphic matter, however produced or reproduced, including but not limited to correspondence, telegrams, contracts, agreements, notes in any form, memoranda, diaries, voice recording tapes, microfilms, pictures, computer media, work papers, calendars, minutes of meetings or other writings or graphic matter, including copies containing marginal notes or variations of any of the foregoing, now or previously in your possession. In the event any documents requested by this Request for Information have been transferred beyond the Company's control, describe the circumstances under which the document was destroyed or transferred and provide an exact citation to the subject document. In the event that documents containing the exact information do not exist, but documents do exist which contain portions of the required information or which contain substantially similar information, then the definition of "documents" shall include the documents which do not exist and these documents will be provided.
- C. "Equality" means "Equality Community Housing Corporation," "Haverstock Hills" and "Haverstock Hills Apartments."

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EQUALITY COMMUNITY HOUSING CORPORATION'S
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INSTRUCTIONS

1. Pursuant to 16 TAC § 22.144(c)(2)(F), Equality requests that answers to the requests for information be made under oath.
2. Please copy the question immediately above the answer to each question. State the name of the witness in this cause who will sponsor the answer to the question and can vouch for the truth of the answer.
3. These questions are continuing in nature, and if there is a relevant change in circumstances, submit an amended answer, under oath, as a supplement to your original answer.
4. Words used in the plural shall also be taken to mean and include the singular. Words used in the singular shall also be taken to mean and include the plural.
5. The present tense shall be construed to include the past tense, and the past tense shall be construed to include the present tense.
6. If any document is withheld under any claim of privilege, please furnish a list identifying each document for which a privilege is claimed, together with the following information: date, sender, recipients or copies, subject matter of the document, and the basis upon which such privilege is claimed.
7. Pursuant to 16 TAC § 22.144(h)(4), if the response to any request is voluminous, please provide a detailed index of the voluminous material.
8. Equality requests that each item of information be made available as it is completed, rather than upon completion of all information requested.

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**EQUALITY COMMUNITY HOUSING CORPORATION'S
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QUESTIONS

1. Provide a complete breakdown of billing amounts for all meters serving Equality from May 12, 2013, to date showing gallons billed and the bill amounts in dollars for each billing period.
2. Provide calculations for the refunds that include the Commission's interest rate, as directed in State Office of Administrative Hearing Order No. 14.
3. For each customer account, provide:
 - a. the earlier of the initial meter reading or the meter reading for the June 2013 billing period and
 - b. the later of the final meter reading or the meter reading for the most recent billing period.
4. For each customer account provided in response to Question 3, state each month billed.