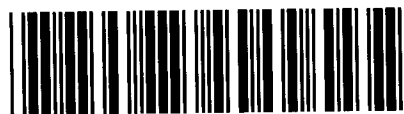




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APPLICATION OF DOUGLAS
UTILITY COMPANY TO CHANGE
WATER AND SEWER RATE/TARIFF
IN HARRIS COUNTY, TEXAS

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BEFORE THE STATE OFFICE
FILING CLERK
OF
ADMINISTRATIVE HEARINGS

**EQUALITY COMMUNITY HOUSING CORPORATION'S
RESPONSE TO DOUGLAS UTILITY COMPANY'S
RESPONSE TO STAFF'S RECOMMENDATION**

Equality Community Housing Corporation ("Equality") files this Response to Douglas Utility Company's ("DUC") Response to Staff's Recommendation dated October 21, 2015, and requests that the SOAH Administrative Law Judge ("ALJ") adopt an Order consistent with the Staff's request as set out in its October 15, 2015 "Response to Douglas Utility Company's Response to Staff's Recommendation."

There is only one thing that needs to be done at this time in order to implement DUC's motion to withdraw its application; to wit, DUC must provide the parties with a complete description of how much it billed each such customer since March 12, 2013, and how much refund or surcharge is owed to or from each customer after accounting for the difference and applying the PUC approved interest rate. To date, the information Equality has received from DUC is very difficult to decipher and, to the extent Equality can understand it, understated. As a consequence, Equality had to file its October 13, 2015 RFI, to which no response has yet been filed.

Request for Relief

For the foregoing reasons, Equality supports the Staff's recommended procedure to establish a technical conference (that would include attorneys) and also requests that the ALJ

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order DUC to respond to all outstanding discovery requests. 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 28th day of October, 2015.

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



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