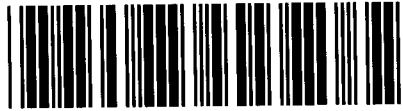


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DOCKET NO. 45266

RECEIVED

**APPLICATION OF HOUSE HAHL
COMMERICAL OWNERS
ASSOCIATION FOR EXEMPT
UTILITY REGISTRATION**

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PUBLIC UTILITY COMMISSION

OF TEXAS

2016 APR -8 AM 11:50
PUBLIC UTILITY COMMISSION
FILING CLERK

**COMMISSION STAFF'S FIRST REQUEST FOR INFORMATION
TO HOUSE HAHL COMMERICAL OWNERS ASSOCIATION
QUESTION NOS. STAFF 1-1 THROUGH STAFF 1-7**

Pursuant to 16 Tex. Admin. Code Ann. § 22.144 (TAC), the Staff of the Public Utility Commission of Texas (Staff) requests that the House Hahl Commercial Owners Association by and through its attorneys of record, provide the following information and answer the following question(s) under oath. The question(s) shall be answered in sufficient detail to fully present all of the relevant facts, within the time limit provided by the Presiding Officer or within 20 days, if the Presiding Officer has not provided a time limit. Please copy the question immediately above the answer to each question. These question(s) 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. 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.

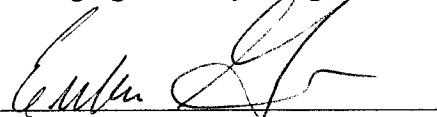
Provide an original and three copies of your answers to the questions to the Filing Clerk, Public Utility Commission of Texas, 1701 N. Congress Avenue, P.O. Box 13326, Austin, Texas 78711-3326.

Dated: April 8, 2016

Respectfully Submitted,

Margaret Uhlig Pemberton
Division Director-Legal Division

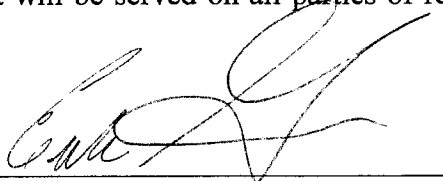
Karen S. Hubbard
Managing Attorney - Legal Division



Erika N. Garcia
Attorney-Legal Division
State Bar No. 24092077
(512) 936-7290
(512) 936-7268 (facsimile)
Public Utility Commission of Texas
1701 N. Congress Avenue
P.O. Box 13326
Austin, Texas 78711-3326

CERTIFICATE OF SERVICE

I certify that a copy of this document will be served on all parties of record on April 8, 2016, in accordance with 16 TAC § 22.74.



Erika N. Garcia

DOCKET NO. 45266

**COMMISSION STAFF'S FIRST REQUEST FOR INFORMATION
TO HOUSE HAHL COMMERCIAL OWNERS ASSOCIATION
QUESTION NOS. STAFF 1-1 THROUGH STAFF 1-7**

DEFINITIONS

- A. "House Hahl" or "you" refers to the House Hahl Commercial Owners Association 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.

DOCKET NO. 45266

**COMMISSION STAFF'S FIRST REQUEST FOR INFORMATION
TO HOUSE HAHL COMMERCIAL OWNERS ASSOCIATION
QUESTION NOS. STAFF 1-1 THROUGH STAFF 1-7**

INSTRUCTIONS

- 1) Pursuant to 16 TAC § 22.144(c)(2), Staff 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(g)(4), if the response to any request is voluminous, please provide a detailed index of the voluminous material.
- 8) Staff 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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**COMMISSION STAFF'S FIRST REQUEST FOR INFORMATION
TO HOUSE HAHL COMMERCIAL OWNERS ASSOCIATION
QUESTION NOS. STAFF 1-1 THROUGH STAFF 1-7**

Please refer to Attachment B, a map filed by House Hahl on February 1, 2016, for questions Staff 1-1 – 1-3.

Staff 1-1 Within the service area boundary designated on Attachment B, how many active connections are there? Active connections are defined by 16 Tex. Admin Code § 24.3(2) (TAC) as “water or sewer connections currently being used to provide retail water or sewer service, or wholesale service.” Please specify how many of these connections, if any, are water and how many are wastewater.

Staff 1-2 Within the service area boundary designated on Attachment B, how many inactive connections are there? Inactive connections are defined by 16 TAC § 24.3(31) as “water or wastewater connections tapped to the applicant’s utility and that are not currently receiving service from the utility.” Please specify how many of these connections, if any, are water and how many are wastewater.

Staff 1-3 Staff has identified twenty-two existing buildings and five proposed buildings within the service area boundary.

- a) For any of the existing buildings that do not currently have inactive or active water connections- will connections be installed at those building in the future?
- b) For any of the proposed buildings- will water connections be installed at those buildings when they are constructed?
- c) What is the actual and/or intended use for each building identified in Attachment B?

Staff 1-4 For the two strip centers on or near 16633 House Hahl Road, how is each unit within each strip center billed for water and wastewater usage?

Staff 1-5 How many connections is House Hahl currently billing per month for water service and how many for sewer service?

Staff 1-6 Is House Hahl currently charging the rates proposed in its tariff? If so, please provide a copy of a water and sewer bill.

Staff 1-7 Does House Hahl have a standard lease form? If so, please provide a copy.