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DOCKET NO. 47479  
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COMPLAINT OF DONALD GRANT  
AGAINST RELIANT ENERGY RETAIL  
SERVICES, LLC

§  
§  
§

PUBLIC UTILITY COMMISSION  
COMMISSION  
FILING CLERK  
OF TEXAS

### COMMISSION STAFF'S LIST OF ISSUES

Commission Staff (Staff) of the Public Utilities Commission of Texas, representing the public interest, and files this List of Issues. In support thereof, Staff shows the following:

#### I. BACKGROUND

On August 8, 2017, Donald Grant filed a complaint a formal complaint against Reliant Energy Retail Services, LLC ("Reliant"), regarding his request to make payment arrangements and have a switch-hold removed from his account for service at 215 Rennie Drive, Katy, Texas 77450. On September 18, 2017, an order was entered setting September 26, 2017, as the deadline for filing a list of issues. Therefore this pleading is timely filed.

#### II. LIST OF ISSUES

1. Did Reliant violate 16 TAC § 25.480 when it placed a switch-hold on Mr. Grant's account?
2. Is Donald Grant entitled to payment arrangements?
3. Did Donald Grant receive averaged billing from Reliant?
4. Is Donald Grant entitled to a discount?

#### III. CONCLUSION

Staff respectfully requests that the entry of an order consistent with the above recommendations.

September 26, 2017

Respectfully Submitted,

Margaret Uhlig Pemberton  
Division Director  
Legal Division

Karen S. Hubbard  
Managing Attorney  
Legal Division



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**CERTIFICATE OF SERVICE**

I certify that a copy of this document will be served on all parties of record September 26, 2017, in accordance with 16 TAC § 22.74.



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Landon J. Lill