



Control Number: 48454



Item Number: 20

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**DOCKET NO. 48454**

<b>COMPLAINT OF NZINGA HUGHES</b>	<b>§</b>	<b>PUBLIC UTILITY COMMISSION</b>
<b>AGAINST THE TRAILS AT DOMINION</b>	<b>§</b>	
<b>PARK, AB-GO TRAILS AT DOMINION</b>	<b>§</b>	<b>OF TEXAS</b>
<b>PARK PROPCO, LLC, NWP SERVICES</b>	<b>§</b>	
<b>CORPORATION, HARRIS COUNTY</b>	<b>§</b>	
<b>MUNICIPAL UTILITY DISTRICT NO.</b>	<b>§</b>	
<b>215, AND GOLDOLLER REAL ESTATE</b>	<b>§</b>	
<b>INVESTMENTS</b>	<b>§</b>	

**COMMISSION STAFF'S THIRD REQUEST FOR INFORMATION  
TO REALPAGE UTILITY MANAGEMENT, INC.  
QUESTION NOS. STAFF 3-1 THROUGH STAFF 3-12**

Pursuant to 16 Texas Administrative Code (TAC) § 22.144, the Staff (Staff) of the Public Utility Commission of Texas (Commission) requests that RealPage Management, Inc. (RealPage) 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.

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Dated: February 26, 2019

Respectfully Submitted,

**PUBLIC UTILITY COMMISSION OF TEXAS  
LEGAL DIVISION**

Margaret Uhlig Pemberton  
Division Director

Katherine Lengieza Gross  
Managing Attorney



Joshua Adam Barron  
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1701 N. Congress Avenue  
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**CERTIFICATE OF SERVICE**

I certify that a copy of this document will be served on all parties of record February 26, 2019 in accordance with 16 TAC § 22.74.



Joshua Adam Barron

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**COMMISSION STAFF'S THIRD REQUEST FOR INFORMATION  
TO REALPAGE UTILITY MANAGEMENT, INC.  
QUESTION NOS. STAFF 3-1 THROUGH STAFF 3-12**

**DEFINITIONS**

- 1) "RealPage", "the Company" or "you" refers to RealPage Management, Inc. and any person acting or purporting to act on their behalf, including without limitation, attorneys, agents, advisors, investigators, representatives, employees or other persons.
- 2) "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 exist and these documents will be provided.

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**COMMISSION STAFF'S THIRD REQUEST FOR INFORMATION  
TO REALPAGE UTILITY MANAGEMENT, INC.  
QUESTION NOS. STAFF 3-1 THROUGH STAFF 3-12**

**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 THIRD REQUEST FOR INFORMATION  
TO REALPAGE UTILITY MANAGEMENT, INC.  
QUESTION NOS. STAFF 3-1 THROUGH STAFF 3-12**

- Staff 3-1 Please refer to item 4, pages 34-55. Explain how Occupancy Value Days are determined.
- Staff 3-2 Please refer to item 4, pages 34-55. Explain how Square Footage Value Days are determined.
- Staff 3-3 Provide the information needed to calculate the Occupancy Value Days from July 2016 2017 through July 2018.
- Staff 3-4 Provide the information needed to calculate the Square Footage Value Days from July 2016 through July 2018.
- Staff 3-5 Please refer to item 4, pages 52-55. Explain the \$11,380.50 credit that appeared on both Ms. Hughes water and sewer bills for the January 2018, February 2018, March 2018 and April 2018 production months. Please include all calculations used to determine the credit.
- Staff 3-6 Please refer to Staff request for information no 1-9 and your response, item 12, page 5. Explain why RealPage issued estimated bills for April 2017, May 2017, August 2017, November 2017, and March 2018 even though Harris County MUD No. 215 issued bills for the following service periods:
- March 31, 2017 to May 2, 2017, please refer to item 12, Exhibit 1-22, 2017-05-4
  - August 1, 2017 to August 31, 2017, please refer to item 12, Exhibit 1-22, 2017-09-05
  - November 1, 2017 to November 30, 2017, please refer to item 12, Exhibit 1-22, 2017-12-05; and
  - February 28, 2018 to April 2, 2018, please refer to item 12, Exhibit 1-22, 2018-04-04
- Staff 3-7 Please refer to item 12, page 100. Explain the \$12,269.52 miscellaneous charge on the Harris County MUD No. 215 bill for service from February 2, 2017 to March 2, 2017. Please include all related calculations and/or correspondence explaining the charge by Harris County MUD No. 215.
- Staff 3-8 Was the above amount passed on to tenants? If so, please explain the method used, including all related calculations.

- Staff 3-9      Provide the invoices RealPage sent Ms. Hughes for service from March 20, 2018 through July 31, 2018.
- Staff 3-10     Provide the calculations for the invoices RealPage sent Ms. Hughes for service from May 21, 2018 through July 31, 2018.
- Staff 3-11     Provide any notice of rate change from Harris County MUD 215 to the Trails at Dominion Park from January 2017 through July 2018.
- Staff 3-12     Provide Harris County MUD 215 invoices for service from July 1, 2016 through November 30, 2016.