



Control Number: 48454



Item Number: 24

Addendum StartPage: 0

RECEIVED

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

PUBLIC UTILITY COMMISSION

2019 SEP 15 PM 1:44

OF TEXAS

PUBLIC UTILITY COMMISSION
FILING CLERK

COMMISSION STAFF'S LIST OF ISSUES

COMES NOW the Staff (Staff) of the Public Utility Commission of Texas (PUC), representing the public interest, and files this List of Issues.

I. BACKGROUND

On June 11, 2018, Nzinga Hughes (Hughes) filed a complaint against The Trails at Dominion Park (The Trails), Ab-Go Trails at Dominion Park Propco, LLC (Ab-Go Trails), NWP Services Corporation (NWP), Harris County Municipal Utility District No. 215 (the District), and Goldoller Real Estate Investments (Goldoller).

On September 24, 2018, the Administrative Law Judge granted the District's request to be removed from the proceeding.

An Order of Referral, issued by Commission Advising and Docket Management on August 16, 2019, referred the docket to the State Office of Administrative Hearings (SOAH) and stated that Staff may file a list of issues to be addressed in the docket by September 5, 2019. Therefore, this pleading is timely filed.

II. STAFF'S LIST OF ISSUES

Staff proposes the following list of issues for the Commissioners' consideration:

1. How does the Trails at Dominion Park submeter/allocate water and sewer service?
2. Does the allocation method comply with Commission rules?
3. Did the Trails at Dominion Park properly bill the complainant for submetering/allocation of water and sewer service? 16 Texas Administrative Code (TAC) § 24.281(e)(1)(A) and (e)(2)(A)(iv)?

4. If it is determined that the complainant is owed money, what amount is she owed? did not, what is the appropriate remedy?
5. What is the relevant time period for review?

III. CONCLUSION

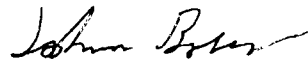
Staff respectfully requests that its list of issues be among the issues considered by the Commission in this proceeding.

Respectfully Submitted,

PUBLIC UTILITY COMMISSION OF TEXAS LEGAL DIVISION

Margaret Uhlig Pemberton
Division Director

Rachelle Nicolette Robles
Managing Attorney

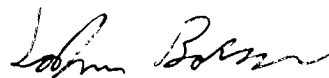


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DOCKET NO. 48454

CERTIFICATE OF SERVICE

I certify that a copy of this document will be served on all parties of record on September 5, 2019, in accordance with 16 TAC § 22.74.



Joshua Adam Barron