



Control Number: 48454



Item Number: 24

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**DOCKET NO. 48454**

**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 §**

**RECEIVED  
PUBLIC UTILITY COMMISSION  
OF TEXAS  
2019 SEP 15 PM 1:44**

**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**

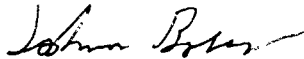
Staff respectfully requests that its list of issues be among the issues considered by the Commission in this proceeding.

Respectfully Submitted,

### **PUBLIC UTILITY COMMISSION OF TEXAS LEGAL DIVISION**

Margaret Uhlig Pemberton  
Division Director

Rachelle Nicolette Robles  
Managing Attorney



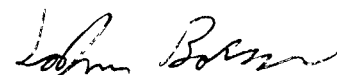
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### **CERTIFICATE OF SERVICE**

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.



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Joshua Adam Barron