



Control Number: 48454



Item Number: 27

Addendum StartPage: 0

**SOAH DOCKET NO. 473-19-6762.WS
PUC DOCKET NO. 48454**

2019 SEP 17 AM 9:07
PUC
Docket

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

**COMMISSION STAFF'S FOURTH REQUEST FOR INFORMATION
TO REALPAGE UTILITY MANAGEMENT, INC.
QUESTION NOS. STAFF 4-1 THROUGH STAFF 4-6**

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 attorney 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.

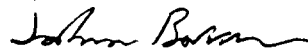
Dated: September 16, 2019

Respectfully Submitted,

**PUBLIC UTILITY COMMISSION OF TEXAS
LEGAL DIVISION**

Margaret Uhlig Pemberton
Division Director

Rachelle Nicolette Robles
Managing Attorney



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PUC DOCKET NO. 48454**

CERTIFICATE OF SERVICE

I certify that a copy of this document will be served on all parties of record September 17, 2019 in accordance with 16 TAC § 22.74.



Joshua Adam Barron

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**COMMISSION STAFF'S FOURTH REQUEST FOR INFORMATION
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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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QUESTION NOS. STAFF 4-1 THROUGH STAFF 4-6**

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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QUESTION NOS. STAFF 4-1 THROUGH STAFF 4-6**

- Staff 4-1 Provide the number of occupants in all dwelling units from June 2016 to July 2018 for each month.
- Staff 4-2 Indicate whether the Trails at Dominion Park (Trails) or RealPage contacted North Harris County MUD #215 (District) when monthly bills were not received for May 2015, August 2015, October 2015, February 2016, August 2016, December 2016, April 2017, May 2017, July 2018, August 2017, September 2017, November 2017, December 2017, February 2018, March 2018 and April 2018.
- Staff 4-3 Indicate whether the Trails paid the District for each of the above months in #2.
- Staff 4-4 Provide proof of payment to the District for each of the above months in #2.
- Staff 4-5 Provide documentation, such as the rate schedule approved by the District, of water base charges billed by the District from July 2016 to July 2018.
- Staff 4-6 Provide documentation, such as the rate schedule approved by the District, of sewer base charges billed by the District from July 2016 to July 18.