



Control Number: 48454



Item Number: 7

Addendum StartPage: 0

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 §

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PUBLIC UTILITY COMMISSION

PUBLIC UTILITY COMMISSION
OF TEXAS
FILING CLERK

**COMMISSION STAFF'S FIRST REQUEST FOR INFORMATION
TO REALPAGE UTILITY MANAGEMENT, INC.
QUESTION NOS. STAFF 1-1 THROUGH STAFF 1-27**

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.

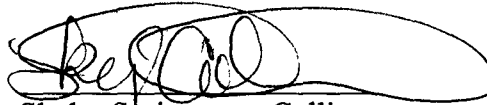
Dated: September 10, 2018

Respectfully Submitted,

**PUBLIC UTILITY COMMISSION OF TEXAS
LEGAL DIVISION**

Margaret Uhlig Pemberton
Division Director

Katherine Lengieza Gross
Managing Attorney

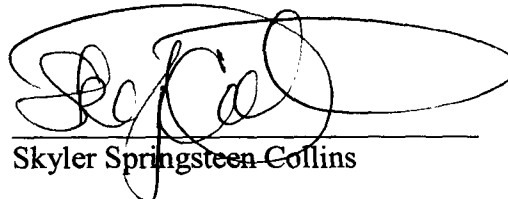


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CERTIFICATE OF SERVICE

I certify that a copy of this document will be served on all parties of record September 10, 2018 in accordance with 16 TAC § 22.74.


Skyler Springsteen Collins

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**COMMISSION STAFF'S FIRST REQUEST FOR INFORMATION
TO REALPAGE UTILITY MANAGEMENT, INC.
QUESTION NOS. STAFF 1-1 THROUGH STAFF 1-27**

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 not exist and these documents will be provided.

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**COMMISSION STAFF'S FIRST REQUEST FOR INFORMATION
TO REALPAGE UTILITY MANAGEMENT, INC.
QUESTION NOS. STAFF 1-1 THROUGH STAFF 1-27**

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 FIRST REQUEST FOR INFORMATION
TO REALPAGE UTILITY MANAGEMENT, INC.
QUESTION NOS. STAFF 1-1 THROUGH STAFF 1-27**

- Staff 1-1** Provide a copy of Ms. Hughes's current lease, including any addendums.
- Staff 1-2** Provide a copy of Ms. Hughes's previous leases dating back to 2014, including any addendums.
- Staff 1-3** Provide the names of the entities RealPage Utility Management is representing in this matter.
- Staff 1-4** Provide an explanation of how the monthly water and sewer bills are calculated for tenants at Trails at Dominion Park.
- Staff 1-5** Indicate how late payments are determined.
- Staff 1-6** Provide an explanation of the Central Harris Regional Water Authority (CHCRWA) fee.
- Staff 1-7** How is the CHCRWA fee calculated?
- Staff 1-8** Indicate any and all months, dating back to 2014, in which any tenant at Trails at Dominion Park received a water or sewer bill that encompassed a period greater than 30 days.
- Staff 1-9** Indicate any and all months, dating back to 2014, in which any tenant at Trails at Dominion Park received a water or sewer bill calculated using usage projections from previous months.
- Staff 1-10** Explain the method for adjusting a water or sewer bill that encompassed a period greater than 30 days.
- Staff 1-11** Explain the method for adjusting a water or sewer bill that was calculated using usage projections from previous months.
- Staff 1-12** Have bills that were calculated using usage projections from previous months always been adjusted?
- Staff 1-13** Is RealPage Utility/NWP the third party biller for Trails at Dominion Park? If the answer is yes, indicate the date on which RealPage/NWP became the third party biller.
- Staff 1-14** Provide all utility bills from Harris County MUD #215 to Trails at Dominion Park for the period of January 2017 through July 2018.

- Staff 1-15** Explain why tenants' utility bills began to show a separate line item for a "water base fee" beginning in January 2018.
- Staff 1-16** Explain why tenants' utility bills began to show a separate line item for a "sewer base fee" beginning in January 2018.
- Staff 1-17** Indicate whether the requisite utility deductions for common areas at Trails of Dominion Park have been applied each month since January 2014.
- Staff 1-18** Indicate whether the requisite utility deductions for vacant apartments at Trails of Dominion Park have been applied each month since January 2014.
- Staff 1-19** Provide the account information for any account that Trails at Dominion Park has with a Harris County MUD #215.
- Staff 1-20** Provide the account information for any account that Ab-Go Trails at Dominion Park Propco, LLC has with Harris County Mud #215.
- Staff 1-21** Provide the utility bills for any account that Trails at Dominion Park has with Harris County MUD #215 from January 2017 through May 2018.
- Staff 1-22** Provide the utility bills for any account that Ab-Go Trails at Dominion Park Propco, LLC has with Harris County MUD #215 from January 2017 through May 2018.
- Staff 1-23** How many water meters are active at Trails at Dominion Park?
- Staff 1-24** Provide the utility bills for any account that Ab-Go Trails at Dominion Park Propco, LLC had with Harris County MUD #215 from January 2017 through May 2018.
- Staff 1-25** How can tenants review the accuracy of their water and sewer bills? Explain the process by which the information is made available.
- Staff 1-26** Has RealPage/NWP change its billing method since January 2014? If the answer is yes, explain how.
- Staff 1-27** When did the CHCRWA charges start appearing on the Harris County MUD #215 invoices to Trails at Dominion Park?
- Staff 1-28** Provide all bills from CHCRWA to Trails at Dominion Park from January 2017 until July 2018.