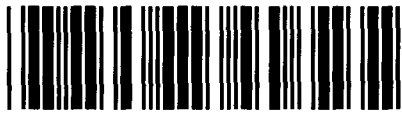




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COMPLAINT OF DEBORAH
LOWE AGAINST SADDLEBROOK
COMMUNITY AND SUN
COMMUNITIES, INC.

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PUBLIC UTILITY COMMISSION

OF TEXAS

PUBLIC UTILITY COMMISSION
FILING CLERK

**COMMISSION STAFF'S FIRST REQUEST FOR INFORMATION
TO SADDLEBROOK COMMUNITY AND SUN COMMUNITIES, INC.
QUESTION NOS. STAFF 1-1 THROUGH STAFF 1-12**

Pursuant to 16 Texas Administrative Code Ann. (TAC) § 22.144, the Staff of the Public Utility Commission of Texas (Staff) requests that Saddlebrook Community and Sun Communities, Inc. by and through their 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 10 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: February 6, 2019

Respectfully submitted,

**PUBLIC UTILITY COMMISSION OF TEXAS
LEGAL DIVISION**

Margaret Uhlig Pemberton
Division Director

Karen S. Hubbard
Managing Attorney

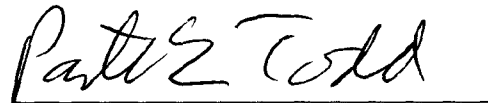


Patrick D. Todd
State Bar No. 24106513
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Austin, Texas 78711-3326
(512) 936-7290
(512) 936-7268 (facsimile)
Patrick.Todd@puc.texas.gov

DOCKET NO. 49060

CERTIFICATE OF SERVICE

I certify that a copy of this document will be served on all parties of record on February 6, 2019 in accordance with 16 TAC § 22.74.


Patrick D. Todd

DOCKET NO. 49060

**COMMISSION STAFF'S FIRST REQUEST FOR INFORMATION
TO SADDLEBROOK COMMUNITY AND SUN COMMUNITIES, INC.
QUESTION NOS. STAFF 1-1 THROUGH STAFF 1-12**

DEFINITIONS

- A. "Saddlebrook," refers to Saddlebrook Community and any person acting or purporting to act on their behalf, including without limitation, attorneys, agents, advisors, investigators, representatives, employees or other persons.
- B. "Sun," refers to and Sun Communities, Inc. and any person acting or purporting to act on their behalf, including without limitation, attorneys, agents, advisors, investigators, representatives, employees or other persons.
- C. "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 FIRST REQUEST FOR INFORMATION
TO SADDLEBROOK COMMUNITY AND SUN COMMUNITIES, INC.
QUESTION NOS. STAFF 1-1 THROUGH STAFF 1-12**

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(h)(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 SADDLEBROOK COMMUNITY AND SUN COMMUNITIES, INC.
QUESTION NOS. STAFF 1-1 THROUGH STAFF 1-12**

- Staff 1-1** Please describe in detail how tenants are billed for water and sewer service.
- Staff 1-2** Please provide the number of meters on the property that measure water and sewer service.
- Staff 1-3** Please provide the number of meters associated with the irrigation system and any common areas, such as swimming pools.
- Staff 1-4** Please provide the number of meters associated with residential water use.
- Staff 1-5** Please provide the retail water bills from Maxwell WSC for service from November 1, 2017 to November 30, 2018.
- Staff 1-6** Please provide the retail sewer bills from the City of San Marcos for service from November 1, 2017 to November 30, 2018.
- Staff 1-7** Please provide a copy of all invoices Saddlebrook sent to Ms. Lowe for water and sewer charges.
- Staff 1-8** Please provide the calculations for all invoices Saddlebrook sent Ms. Lowe for water and sewer charges.
- Staff 1-9** Please provide the calculations for the 9% surcharge on all invoices Saddlebrook sent Ms. Lowe.
- Staff 1-10** Please provide the calculation for the \$2.45 credit provided to Ms. Lowe for the error on her water bill for June 6, 2018 to August 17, 2018.
- Staff 1-11** Was the method of billing used for Ms. Lowe also used to calculate rates for the other residents of Saddlebrook?
- Staff 1-12** Does Saddlebrook and Sun continue to use the same calculation method since November 1, 2017? If not, when was the method change and in what way was it changed?