

Control Number: 49429



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PUC DOCKET NO. 49429  
SOAH DOCKET NO. 473-19-5675

RECEIVED  
2019 JUL -9 AM 10:56  
PUBLIC UTILITY COMMISSION  
OFFICE

COMPLAINT OF JARED COWAN § PUBLIC UTILITY COMMISSION  
AGAINST § OF TEXAS  
DICKENS COURT HOA, INC. §

**DISCOVERY**  
**REQUEST FOR INFORMATION**

COMES NOW, JARED COWAN, and files this request for information. Jared Cowan requests the following items:

1. Results of any submeter tests performed in accordance with the ANSI C12 standard on behalf of Dickens Court HOA, Inc. (hereinafter referred to as the "Association") within the past seven (7) years.
2. Results of any other potential forms of electrical submeter testing as required by 16 TAC § 25.142(f)(11).
3. A copy of the Submeter Equipment Record as required by 16 TAC § 25.142(f)(2)(A).
4. Opinions from both the Association's current board members Greg Degeyter and Armandina Garza as well as members of Rise Association Property Management, any of whom may be called to testify, as to whether or not they feel the electrical submeters used by the Association for billing should be replaced.
5. Documentation from Zenco Utility Management Services showing master billing records for the past five (5) years in accordance with 16 TAC § 25.142(d)(4). My understanding is that Zenco should be able to simply print out this information or easily export it into an electronic format such as PDF or Excel.
6. Emails with relevant content regarding the electrical submeter issue between any board members past or present, any homeowners, and Rise Association Management Group or Spectrum Association Management for the period of January 1, 2016 to present.

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7. A copy of any PUC complaints filed against the Association regarding any electric utility issue, and the respective PUC responses, since January 1, 2016.

Respectfully submitted,

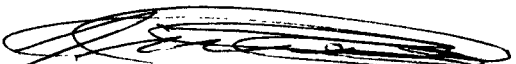
Jared Cowan  
7918 Prestwood Dr. #14  
Houston, TX 77036  
[jared@medbeyond.com](mailto:jared@medbeyond.com)  
281.658.6972

**CERTIFICATE OF SERVICE**

The undersigned hereby certifies that a true and correct copy of the foregoing Response to Complaint Filed by Jared Cowan, has been forwarded to Defendant Dickens Court Homeowners Association, Inc., on this 5<sup>th</sup> day of July 2019, as indicated below:

Dickens Court HOA, Inc.  
c/o Treece Law Firm, P.C.  
1020 Bay Area Blvd., Suite 200  
Houston, TX 77058

Cert. Mail No. 7019 0700 0000 8371 7086  
Return Receipt Requested  
and by Regular Mail and E-Mail to  
[phil@treecelaw.com](mailto:phil@treecelaw.com)

  
Jared Cowan – 07/05/2019