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DOCKET NO. 49557

**COMPLAINT OF AMEENAH
MUHAMMAD AGAINST FORTY200
APARTMENT HOMES**

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**PUBLIC UTILITY COMMISSION
OF TEXAS**

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**COMMISSION STAFF'S FIRST REQUEST FOR INFORMATION
TO FORTY200 APARTMENT HOMES
QUESTION NOS. STAFF 1-1 THROUGH STAFF 1-14**

Pursuant to 16 Texas Administrative Code (TAC) § 22.144, the Staff of the Public Utility Commission of Texas (Staff) requests that Fourty200 Apartment Homes 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: August 21, 2019

Respectfully submitted,

**PUBLIC UTILITY COMMISSION OF TEXAS
LEGAL DIVISION**

Margaret Uhlig Pemberton
Division Director

Karen S. Hubbard
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 August 21, 2019, in accordance with 16 TAC § 22.74.



Steven M. Gonzalez

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**COMMISSION STAFF'S FIRST REQUEST FOR INFORMATION
TO FORTY200 APARTMENT HOMES
QUESTION NOS. STAFF 1-1 THROUGH STAFF 1-14**

DEFINITIONS

- A. "Fourty200," or "you" refers to Fourty200 Apartment Homes, and any person acting or purporting to act on their behalf, including without limitation, attorneys, agents, advisors, investigators, representatives, employees or other persons.

- B. "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 1-1 THROUGH STAFF 1-14**

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
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QUESTION NOS. STAFF 1-1 THROUGH STAFF 1-14**

- Staff 1-1** Please provide a copy of Ameenah Muhammad's lease, including any addendums.
- Staff 1-2** Please provide the total number of dwelling units (both occupied and unoccupied) at Forty200 (Property).
- Staff 1-3** Please provide the total number of occupants in all dwelling units at the beginning of the month starting with the month Ameenah Muhammad' lease began until now.
- Staff 1-4** Please provide the total square footage of all dwellings units on the Property.
- Staff 1-5** Please provide the square footage of Ameenah Muhammad's unit.
- Staff 1-6** Please provide the number of occupants in Ameenah Muhammad's unit.
- Staff 1-7** Please provide any invoices for water and sewer service Please provided to the Property from the retail public utility.
- Staff 1-8** What percentage is deducted from the allocated water to the invoiced water, i.e. common areas?
- Staff 1-9** Please provide any invoices for additional meters on the Property, i.e. specific meters for pool or irrigation.
- Staff 1-10** Please provide a list of all records and documents available to tenants on request at the on-site manager's office during normal business hours and any other information necessary for a tenant to calculate and verify a water and sewer bill.
- Staff 1-11** Did Ameenah Muhammad request information to calculate and verify her water and sewer bill(s)?
- Staff 1-12** Please provide the dates, records and documents that were Please provided to Ameenah Muhammad regarding the above request(s).
- Staff 1-13** Please provide a copy of all invoices Forty200 sent to Ameenah Muhammad for water and sewer service.
- Staff 1-14** Please provide the calculations for all invoices Forty200 sent to Ameenah Muhammad for water and sewer service.