



## Filing Receipt

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**SOAH DOCKET NO. 473-21-2237.WS  
PUC DOCKET NO. 50197**

<b>APPLICATION OF TIMBERCREST PARTNERS LLC FOR AUTHORITY TO CHANGE RATES</b>	§ § §	<b>BEFORE THE STATE OFFICE OF ADMINISTRATIVE HEARINGS</b>
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**TIMBERCREST PARTNERS LLC'S RESPONSE TO COMMISSION STAFF'S  
ELEVENTH REQUEST FOR INFORMATION**

TO: Public Utility Commission of Texas, by and through their attorneys of record,  
Kevin Bartz, 1701 N. Congress Avenue, P.O. Box 13326, Austin, Texas 78711-  
3326.

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COMES NOW, Timbercrest Partners, LLC ("TCP"), by and through their attorneys of  
record, and files these responses to The Public Utility Commission of Texas' Eleventh Requests  
for Information. TCP stipulates that these responses may be treated as if filed under oath.

Respectfully submitted,

Shea & Associates, PLLC

By: /s/ Tammy Shea  
Tammy Wavle-Shea  
State Bar No. 24008908  
4830 Wilson Road Suite 300-236  
Houston, Texas 77396  
Telephone: (713) 410.0856  
Email: [tshea@tshealaw.com](mailto:tshea@tshealaw.com)

**ATTORNEYS FOR  
TIMBERCRESTPARTNERS, LLC**

**CERTIFICATE OF SERVICE**

I hereby certify that a copy of this document will be served on all parties of record on October 20, 2022 in accordance with 16 TAC § 22.74 and the Commission's rules requiring electronic service.

/s/ Tammy Shea  
Tammy Shea

## **RESPONSES TO ELEVENTH RFIS**

**Staff 11-1** Please indicate whether the individual trailer park lots have a water meter installed.

Response: No, the mobile home park was built in or about 1994 and there has been no request to submeter or individually meter the mobile home rental community. Pursuant to Tex. Util. Code § 13.502(b), a mobile home rental community before 2003 is not required to be submetered or individually metered. This provision states:

(b) Except as provided by Subsections (c) and (d), a manager of a condominium or the owner of an apartment house, manufactured home rental community, or multiple use facility, on which construction begins after January 1, 2003, shall provide for the measurement of the quantity of water, if any, consumed by the occupants of each unit through the installation of: (1) submeters, owned by the property owner or manager, for each dwelling unit or rental unit; or (2) individual meters, owned by the retail public utility, for each dwelling unit or rental unit.

Prepared by: Chuck Loy  
Sponsored by: Chuck Loy

**Staff 11-2** Please indicate whether the individual apartment units or apartment complex are submetered.

**Response:** No, the owner of the apartment complex has not installed meters. Pursuant to Tex. Util. Code § 13.502(b) and (d), it is the responsibility of the owner or the manager of the apartment complex to install meters or arrange for the installation of meters. The public utility is not required to install meters, unless the owner of the apartment complex requests it and it is feasible. No request has been made.

(b) Except as provided by Subsections (c) and (d), a ***manager of a condominium or the owner*** of an apartment house, manufactured home rental community, or multiple use facility, on which construction begins after January 1, 2003, shall provide for the measurement of the quantity of water, if any, consumed by the occupants of each unit through the installation of: (1) submeters, owned by the property owner or manager, for each dwelling unit or rental unit; or (2) individual meters, owned by the retail public utility, for each dwelling unit or rental unit.

(d) ***On request by the property owner or manager***, a retail public utility shall install individual meters owned by the utility in an apartment house, manufactured home rental community, multiple use facility, or condominium on which construction begins after January 1, 2003, unless the retail public utility determines that installation of meters is not feasible. If the retail public utility determines that installation of meters is not feasible, the property owner or manager shall install a plumbing system that is compatible with the installation of submeters or individual meters. A retail public utility may charge reasonable costs to install individual meters.

Prepared by: Chuck Loy  
Sponsored by: Chuck Loy

**Staff 11-3** Please indicate whether the apartment complex is owned by Timbercrest or an affiliate of Timbercrest.

**Response:** Timbercrest Partners LLC does not own the apartment complex. The Haven Apartment Complex is owned by Elmfield Holdings LLC and Haven Springs TX LLC. Elmfield Holdings LLC is a subsidiary of Timbercrest Partners LLC.

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Sponsored by: Chuck Loy