



## Filing Receipt

**Received - 2022-11-03 12:35:23 PM**  
**Control Number - 50197**  
**ItemNumber - 115**

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

<b>APPLICATION OF TIMBERCREST PARTNERS LLC FOR AUTHORITY TO CHANGE RATES</b>	<b>§ § §</b>	<b>BEFORE THE STATE OFFICE OF ADMINISTRATIVE HEARINGS</b>
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**TIMBERCREST PARTNERS LLC’S FIRST SUPPLEMENTAL RESPONSE TO  
COMMISSION STAFF’S EIGHTH 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.

- COMES NOW, Timbercrest Partners, LLC (“TCP”), by and through their attorneys of  
record, and files these First Supplemental Responses to The Public Utility Commission of Texas’  
Eighth 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 TIMBERCREST  
PARTNERS, LLC**

Staff 8-6 Please refer to the Timbercrest' s application at page 18, "Customer Class Cost of Service Study." Please provide documentation to support insurance expenses (umbrella, general, auto, and bond coverage) of \$7,993 for water and \$8087 for sewer.

**Response :**

The insurance amounts referenced above represent a portion of the total insurance amounts functionalized to the utility and then allocated between water and sewer. Insurance policies go from May to April and Timbercrest financial reports run from April to March. Provided below is an account analysis for each insurance type which shows the monthly amortization and annual totals prior to functionalization and allocation. Support for the insurance payments can be found in Attachment 8-6.

	<b>Insurance General</b>	<b>Insurance Umbrella</b>	<b>Insurance Auto</b>	<b>Insurance Bond</b>
<b>Jan-18</b>	\$2,806.17	\$262.17	\$127.67	\$91.67
<b>Feb-18</b>	\$2,806.17	\$262.17	\$127.67	\$91.67
<b>Mar-18</b>	\$11,853.57	\$4,826.67	\$127.67	\$91.67
<b>Apr-18</b>	\$2,806.17	\$262.17	\$127.67	\$91.67
<b>May-18</b>	\$2,806.17	\$262.17	\$203.67	\$91.67
<b>Jun-18</b>	\$3,180.92	\$261.42	\$169.75	\$91.67
<b>Jul-18</b>	\$3,180.92	\$261.42	\$169.75	\$91.67
<b>Aug-18</b>	\$3,180.92	\$261.42	\$169.75	\$91.67
<b>Sep-18</b>	\$3,180.92	\$261.42	\$169.75	\$91.67
<b>Oct-18</b>	\$3,180.92	\$261.42	\$169.75	\$91.67
<b>Nov-18</b>	\$3,180.92	\$261.42	\$169.75	\$91.67
<b>Dec-18</b>	\$3,180.92	\$261.42	\$169.75	\$91.67
	<b>\$45,344.69</b>	<b>\$7,705.29</b>	<b>\$1,902.60</b>	<b>\$1,100.04</b>

**First Supplemental Response:**

The above amount only includes amounts directly billed to Timbercrest, and does not include any amounts for other locations.

Staff has raised an issue with one of its insurance statements because it notes that the umbrella policy covers a total of 33 locations. This is correct; however, the total amount of the

umbrella policy for all locations was \$86,649.00.  
was \$3137.00. See attachment 8.6 Supp. 1.

Timbercrest's share of this particular policy

Prepared By: Chuck Loy

Sponsored By: Chuck Loy

Sharon Sask <[sharon@harmonycommunities.com](mailto:sharon@harmonycommunities.com)>

11/1/2022 2:56 PM

## Insurance question 50197

To tshea <[tshea@tshealaw.com](mailto:tshea@tshealaw.com)>

Hi Tammy ,

Below is what our insurance agent says about the umbrella costs with 33 properties

**From:** Dianne Daines <[DDaines@totemagencies.com](mailto:DDaines@totemagencies.com)>

**Sent:** November 1, 2022 12:45 PM

**To:** Sharon Sask <[sharon@harmonycommunities.com](mailto:sharon@harmonycommunities.com)>

**Subject:** RE: Insurance question 50197

Hi Sharon - annual premium for the excess liability policy was \$85,649. Timbercrest's premium was \$3,137 per the attached invoice.

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the umbrella means that it covers 33 locations of which Timbercrest is one and the invoice is just charging Timbercrests share. "they are sharing the umbrella costs with 33 properties of which Timbercrest is paying their share."

**From:** Tammy Shea <[tshea@tshealaw.com](mailto:tshea@tshealaw.com)>

**Sent:** November 1, 2022 8:33 AM

**To:** Sharon Sask <[sharon@harmonycommunities.com](mailto:sharon@harmonycommunities.com)>

**Cc:** Chuck Loy <[chuck.loy@gdsassociates.com](mailto:chuck.loy@gdsassociates.com)>

**Subject:** Insurance question 50197

Sharon,

Can you review this policy, page two. [REDACTED]



SHEA & ASSOCIATES, PLLC

Tammy Shea

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Houston, Texas 77060

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Email: [tshea@tshealaw.com](mailto:tshea@tshealaw.com)

## Attachment RFI 8.6 Supp. 1

- 2018 Timbercrest Excess Invoice.pdf (440 KB)
- ATT00001.png (6 KB)

**Totem Agencies, Inc**

P O Box 3419

Kirkland, WA 98083-3419

<b>Customer</b>	Timbercrest Village MHC
<b>Acct #</b>	13940
<b>Date</b>	05/16/2018
<b>Customer Service</b>	Dianne Daines Dianne Daines
<b>Page</b>	1 of 1

Timbercrest Village MHC  
c/o Harmony Communities LLC  
838 West Hastings Street #300  
Vancouver, BC V6C 0A6

Payment Information	
<b>Invoice Summary</b>	\$ 3,137.00
<b>Payment Amount</b>	
<b>Payment for:</b>	Invoice#232280
EBU068025462	

**Thank You**

Please detach and return with payment



Customer: Timbercrest Village MHC

Invoice	Effective	Transaction	Description	Amount
232280 Sub-33	05/20/2018	Renew policy	Policy #EBU068025462 05/20/2018-05/20/2019 AIG / Commerce & Industry Ins. Co.  Umbrella - 2018/19 Excess Liab Policy	3,137.00
				<b>Total</b>
				\$ 3,137.00
				<b>Thank You</b>
Please make checks payable to Totem Agencies Inc				

**Totem Agencies, Inc**

P O Box 3419

Kirkland, WA 98083-3419

(425)827-8774

**Date**

05/16/2018