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STATE OF TEXAS §
 §
COUNTY OF HARRIS §

AFFIDAVIT OF TAMMY SHEA

Before me, the undersigned authority, on this date personally appeared Tammy Shea known to me to be the person whose name is subscribed below, and being by me first duly sworn, stated upon oath as follows:

1. "My name is Tammy Shea I am over 18 years of age, of sound mind, and fully competent to make this affidavit. Each statement of fact herein is true and of my own personal knowledge.
2. I am a partner in the Houston, Texas law firm of Shea Associates PLLP ("Shea"), and have practiced law in Travis County since 1998. I have held positions at Wickliff & Hall, Epstein Becker Green, Cozen O'Connor and Shea & Associates PLLC. My law practice encompasses a wide range of administrative areas, including the representation of electric, gas and water utilities. I have extensive experience representing and defending clients before the Public Utility Commission, TCEQ, and Railroad Commission as well as countless federal and state district courts.
3. I am counsel of record for Timbercrest Partners LLC ("Timbercrest" or the "Company") Inc. in PUC Docket No. 50197, *Application of Timbercrest Partners LLC for Authority to Change Rates*.
4. In Docket No. 50197, my firm was engaged to assist with the presentation and defense of the Company's Statement of Intent to Change Rates. To date, the services performed in this docket include the preparation of the rate filing package to address requests by Commission Staff ("Staff") to assist in their review of the proposed commercial rates of the Timbercrest water and sewer systems, consultation with expert witnesses, reviewing and coordinating responses to discovery, attention to prehearing matters, and the drafting of various pleadings throughout the proceeding.
5. Depending on the course and resolution of Docket No. 50197, my firm expects to continue to assist Timbercrest Partners LLC with responding to discovery, which to date comprises of eight sets of discovery received from Staff, and other prehearing matters. In addition, it is expected that my firm will assist Timbercrest Partners LLC prepare direct testimony, will review Staff testimony, the prepare rebuttal testimony, and prepare for and participate in a hearing on the merits, post-hearing briefing and pleadings, as well as other activities. The rate case expense estimate prepared by Timbercrest Partners LLC reflects the estimated cost of these legal services, as well as the costs expected to be incurred by professional consultants retained to provide direct and rebuttal testimony and participate in the hearing.
6. I have reviewed the billings of Shea submitted to Timbercrest Partners LLC for legal services performed in Docket Nos. 50197 through September 7, 2022, and I affirm that those billings accurately reflect the time spent and expenditures incurred by Shea and Associates PLLP on Timbercrest Partners LLC's behalf.

7. The rate charged by each attorney and professional of Shea and Associates in Docket Nos. 50197 reflect a discount over the standard hourly billing rates charged by the attorney or professional for other matters, is less than or comparable to the hourly rate charged by other attorneys and professionals for similar services provided to other Texas utilities and is less than the standard hourly billing rate charged by the attorneys and professionals of Shea for services to non-regulated entities.
8. The charges and rates of my firm are reasonable and consistent with those billed by others for similar work, and the legal rates charged by the Shea attorneys that worked on these matters are comparable to rates charged by other professionals with the same level of expertise and experience and commensurate with the complexity of the issues in the proceedings. The calculation of the charges is correct and there was no duplication of services and no double billing of charges.
9. The hours spent to perform the tasks assigned to Shea working on Docket No. 50197 were reasonable and necessary to complete the required tasks in a professional manner on a timely basis. The nature of work was appropriate for the attorneys and professionals of Shea and Associates and expert witnesses given their legal, professional, and expert training and their experience in administrative utility law and prior cases involving similar issues.
10. The amount of expenses and fees charged by Shea attorneys in Docket No. 50197 are less than or commensurate to the size and complexity of the issues addressed. In particular, the nature of the utility operation within the mobile home park which provides water and sewer service to unmetered residential customers and the need for a new water rate for a larger, multi metered commercial customer has contributed the complexity of this case.
11. I have reviewed and am familiar with the Commission's requirements for recovery of rate case expenses set forth in 16 Tex. Admin. Code § 24.44. Based on my experience in cases of similar size as well as the novelty and complexity of issues particular to this case, all of the fees and expenses charged by Shea to Timbercrest Partners LLC in Docket No. 50197 are reasonable, necessary, and appropriately reimbursable.
12. No single attorney or professional of Shea and Associates billed in excess of 12 hours in a single day.
13. No attorney or professional of Shea and Associates has billed for charges that result from hotel or lodging.
14. No portion of Shea and Associate's fees or expenses is or will be from the use of a non-commercial aircraft or first-class air travel commercial aircraft or first-class air travel.
15. No portion of Shea and Associate's fees or expenses is or will be for luxury items, such as limousine service, sporting events, alcoholic beverages, gourmet coffee, bottled water, hotel movies, satellite radio, or other entertainment.
16. No portion of Shea's fees or expenses are in excess of \$25 per person per meal.



Tammy renee Shea

~~TAMMY SHEA~~ RF

State of Texas / County of Harris

8th

SWORN AND SUBSCRIBED before me on this ~~7th~~ ^{XX} day of September 2022. By Tammy renee Shea.

RF

Roosevelt Flahnma Roosevelt Flahnma
Notary Public in and for the State of Texas

Notarized online using audio-video communication

