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**COMPLAINT OF CARBAJAL
AGAINST CSC NORTH AUSTIN
REALITY, LLC**

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**PUBLIC UTILITY COMMISSION
OF TEXAS**

COMMISSION STAFF'S SUPPLEMENTAL STATEMENT OF POSITION

COMES NOW the Staff (Staff) of the Public Utility Commission of Texas (Commission), representing the public interest, and files this Commission Staff's Statement of Position. In support thereof, Staff shows the following:

I. BACKGROUND

On March 6, 2020, Emma Carbajal filed a complaint against CSC North Austin Reality, LLC (CSC) under 16 Texas Administrative Code (TAC) § 22.242. Specifically, Ms. Carbajal's complaint alleges that CSC, as the owner of Creeks Edge Apartments (Creeks Edge) in Austin, Texas, violated the Commission's rules on non-submetered billing allocation during Ms. Carbajal's 2018-2019 lease. Ms. Carbajal requests a refund for the amount she alleges she was over-billed during the 2018-2019 lease, as well as the imposition of additional penalties for CSC's alleged continued violation of laws governing water and wastewater cost allocations.

On May 1, 2020, Staff filed a statement of position addressing jurisdiction, compliance with the informal resolution requirement, and the details of Ms. Carbajal's complaint. Because CSC had not responded to the complaint by Staff's May 1, 2020 deadline, Staff did not take a position on the subject of the complaint at that time.

On May 18, 2020, Order No. 3 was issued, directing CSC to respond to the complaint by June 1, 2020 and requiring Staff to file a supplemental statement of position by June 15, 2020. Therefore, this pleading is timely filed.

II. STAFF'S POSITION

To date, CSC has failed to respond to Ms. Carbajal's complaint. Because CSC has not responded to the complaint, Staff cannot file its supplemental statement of position at this time. Staff recommends that CSC be given until July 1, 2020 to respond to the complaint and that Staff be given until July 15, 2020 to file a supplemental statement of position.

III. CONCLUSION

Staff respectfully requests that an order be issued requiring CSC to respond to the complaint by July 1, 2020 and requiring Staff to file a supplemental statement of position by July 15, 2020.

Dated: June 15, 2020

Respectfully submitted,

PUBLIC UTILITY COMMISSION OF TEXAS LEGAL DIVISION

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CERTIFICATE OF SERVICE

I certify that, unless otherwise ordered by the presiding officer, notice of the filing of this document was provided to all parties of record via electronic mail on June 15, 2020, in accordance with the Order Suspending Rules, issued in Project No. 50664.

/s/Courtney Dean
Courtney N. Dean