



Control Number: 51156



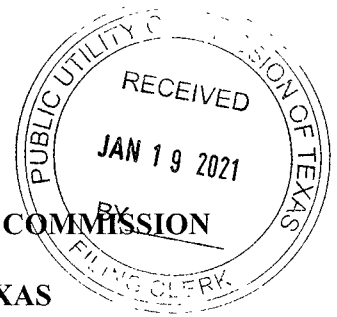
Item Number: 9

Addendum StartPage: 0

PUC DOCKET NO. 51156

COMPLAINT OF SHANEKA L. BUSBY §
BAKER AGAINST THE VERANDA §
APARTMENTS AND DENTON PUBLIC §
FACILITY CORPORATION §

PUBLIC UTILITY COMMISSION
OF TEXAS



**VERANDA APARTMENTS RESPONSE TO COMMISSION STAFF'S FIRST
REQUEST FOR INFORMATION QUESTION NOS. 1-1 THROUGH 1-16**

TO THE HONORABLE ADMINISTRATIVE LAW JUDGE:

Denton Apartments Ltd. c/o Denton Public Facility Corporation for the Veranda Apartments (Veranda) provides this Response to Commission Staff's First Request for Information Question Nos. 1-1 through 1-16.

Respectfully submitted,

/s/ Andres Medrano

Andres Medrano
Texas State Bar No. 24005451
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FOLEY & LARDNER LLP
600 Congress Avenue
Suite 3000
Austin, Texas 78701-2978

CERTIFICATE OF SERVICE

I hereby certify that a true and correct copy of the foregoing instrument will be served on all parties of record in this proceeding in compliance with PUC rules and orders on January 19, 2021.

/s/ Andres Medrano
Andres Medrano

9

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Staff 1-1 Please provide a copy of all leases, including any addendums, signed by Shaneka Busby Baker.

Response: Responsive documents have been provided to Commission Staff and can be filed in this docket upon request pursuant to protective order to protect Ms. Baker's private information.

Response Sponsored by: Bryan N. Glosik, Director of Energy and Water, the NRP Group LLC.

Response Prepared by: Counsel

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Staff 1-2 Please provide a copy of all water and wastewater bills issued to Shaneka Busby Baker for the entirety of her tenancy at The Veranda. Please provide copies of the actual bills rather than a billing ledger for Ms. Baker.

Response: Responsive documents have been provided to Commission Staff and can be filed in this docket upon request pursuant to protective order to protect Ms. Baker's private information.

Response Sponsored by: Bryan N. Glosik, Director of Energy and Water, the NRP Group LLC.

Response Prepared by: Counsel

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Staff 1-3 Please provide all supporting calculations for all bills submitted in response to Staff 1-2.

Response: Responsive documents have been provided to Commission Staff and can be filed in this docket upon request pursuant to protective order to protect Ms. Baker's private information.

Response Sponsored by: Bryan N. Glosik, Director of Energy and Water, the NRP Group LLC.

Response Prepared by: Counsel

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Staff 1-4 Please admit or deny that tenants of the property pay rent at intervals of one month or more.

Response: Admit.

Response Sponsored by: Bryan N. Glosik, Director of Energy and Water, the NRP Group LLC.

Response Prepared by: Counsel

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Staff 1-5 Please provide a copy of all water and wastewater bills issued by the property's water and wastewater provider for service to the property that correspond to the billing periods for the bills provided in response to Staff 1-2.

Response: Responsive documents have been provided to Commission Staff and can be filed in this docket upon request pursuant to protective order to protect Ms. Baker's private information.

Response Sponsored by: Bryan N. Glosik, Director of Energy and Water, the NRP Group LLC.

Response Prepared by: Counsel

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Staff 1-6 Please admit or deny that the water and wastewater bills for the property are allocated to tenants. If you deny, please explain how water and wastewater bills for each dwelling unit are calculated.

Response: Deny. The water and wastewater bills are submetered to individual units.

Response Sponsored by: Bryan N. Glosik, Director of Energy and Water, the NRP Group LLC.

Response Prepared by: Counsel

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Staff 1-7 If the answer to Staff 1-6 is admit, please reference 16 Texas Administrative Code Sec. 24.287(e)(2)(A), the Commission’s rule on charges and calculations for allocated utility service, and identify which allocation methodology is used.

Response: N/A. Staff 1-6 was denied.

Response Sponsored by: Bryan N. Glosik, Director of Energy and Water, the NRP Group LLC.

Response Prepared by: Counsel

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Staff 1-8 If the answer to Staff 1-6 is admit, please identify each common area, including but not limited to, pools or laundry rooms, and confirm whether each common area is separately metered or submetered for water and wastewater service.

Response: N/A. Staff 1-6 was denied.

Response Sponsored by: Bryan N. Glosik, Director of Energy and Water, the NRP Group LLC.

Response Prepared by: Counsel

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Staff 1-9 If all common areas listed in response to Staff 1-8 are separately metered or submetered, please provide the common area usage deducted from each of the property's water and wastewater bills submitted in response to Staff 1-5 and identify which bill it was deducted from.

Response: N/A. See response to Staff 1-8.

Response Sponsored by: Bryan N. Glosik, Director of Energy and Water, the NRP Group LLC.

Response Prepared by: Counsel

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Staff 1-10 If the answer to Staff 1-6 is admit, please confirm: (1) whether the property has a landscape irrigation system (e.g. sprinkler system); and (2) whether the landscape irrigation system is separately metered or submetered for water and wastewater service.

Response: N/A. Staff 1-6 was denied.

Response Sponsored by: Bryan N. Glosik, Director of Energy and Water, the NRP Group LLC.

Response Prepared by: Counsel

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Staff 1-11 If, in response to Staff 1-10, the property has a landscape irrigation system which is separately metered or submetered, please provide the landscape irrigation system usage deducted from each of the property's water and wastewater bills submitted in response to Staff 1-5, and identify which bill(s) it was deducted from.

Response: N/A. See response to Staff 1-10.

Response Sponsored by: Bryan N. Glosik, Director of Energy and Water, the NRP Group LLC.

Response Prepared by: Counsel

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Staff 1-12 Please provide in detail the reason Shaneka Busby Baker's water meter was exchanged for another meter on March 12, 2020.

Response: The meter was replaced out of an abundance of caution to address the concerns that Ms. Baker had raised regarding her water bills.

Response Sponsored by: Bryan N. Glosik, Director of Energy and Water, the NRP Group LLC.

Response Prepared by: Counsel

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Staff 1-13 Please confirm whether or not the removed meter was tested. If so, provide the date of all tests from one year prior to its initial installation at Shaneka Busby Baker's unit to the present; and please provide a copy of the test results from all such tests.

Response: A bucket test was completed on the original meter before it was removed and replaced in March 2020. On January 15, 2020, NRP checked the meter, checked for leaks, and found no issues. NRP returned on February 5, 2020 and February 7, 2020, and checked the popup water heater valve – again, no issues were found. Work orders documenting these tests have been provided to Commission Staff.

Response Sponsored by: Bryan N. Glosik, Director of Energy and Water, the NRP Group LLC.

Response Prepared by: Counsel

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Staff 1-14 Please confirm if the replacement meter was tested before it was installed at Shaneka Busby Baker's unit. If so, provide the dates of all tests which occurred within the last year before it was installed and a copy of all test results from any such tests.

Response: On July 1, 2020, NRP again inspected the meter and checked for leaks and found no issues. A work order documenting this test has been provided to Commission Staff.

Response Sponsored by: Bryan N. Glosik, Director of Energy and Water, the NRP Group LLC.

Response Prepared by: Counsel

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Staff 1-15 Please provide all meter readings and usage history related to Shaneka Busby Baker's water and sewer usage, on a monthly basis, for the entirety of Ms. Baker's tenancy at The Veranda.

Response: The meter reading and usage history information is including in the individual bills to Ms. Baker that have been provided to Commission Staff in response to Staff 1-2.

Response Sponsored by: Bryan N. Glosik, Director of Energy and Water, the NRP Group LLC.

Response Prepared by: Counsel

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Staff 1-16 Please explain if any estimated readings were used to bill Shaneka Busby Baker for water and sewer service at any time during her tenancy at The Veranda. If so, please provide the month and year of all estimates and the amount of such estimates.

Response: Each of the meter readings used to bill Ms. Baker are shown in the individual bills provided to Commission Staff in response to Staff 1-2. To the best of our knowledge none of the bills used estimated readings.

Response Sponsored by: Bryan N. Glosik, Director of Energy and Water, the NRP Group LLC.

Response Prepared by: Counsel