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COMPLAINT OF JEFF CONNORS	§	PUBLIC UTILITY COMMISSION
AGAINST THE GALLERY	§	
APARTMENTS, ROSCOE	§	OF TEXAS
PROPERTY MANAGEMENT, AND		
CONSERVICE		

CONSERVICE’S REPLY BRIEF

Incorrect Billing Dates on Conservice’s Billing Statements

Conservice admits the incorrect service dates from the City of Austin were printed on the Conservice billing statements sent to Complainant. However, the correct service dates and bills were used in the calculation of the Complainant’s charges, thus the dates that were printed incorrectly have not resulted in a billing error.¹ Additionally, billing service dates are not required to be printed on tenant statements per 24.283(f).²

Complainant’s Previous Billing Provider

Throughout the proceeding, Complainant has repeatedly referenced his previous third-party utility billing provider Performance. While he draws broad comparisons between Conservice and Performance, Complainant has not submitted any evidence that Performance’s billing calculations and practices actually

¹ See Item 102 Conservice’s Statement of Position page 7 for a breakdown of the tenant calculations for the disputed time period.

² 24.283(f). Information on bill. The bill must clearly state that the utility service is submetered or allocated, as applicable, and must include all of the following: (1) total amount due for submetered or allocated water; (2) total amount due for submetered or allocated wastewater; (3) total amount due for dwelling unit base charge(s) or customer service charge(s) or both, if applicable; (4) total amount due for water or wastewater usage, if applicable; (5) the name of the retail public utility and a statement that the bill is not from the retail public utility; (6) name and address of the tenant to whom the bill is applicable; (7) name of the firm rendering the bill and the name or title, address, and telephone number of the firm or person to be contacted in case of a billing dispute; and (8) name, address, and telephone number of the party to whom payment is to be made.

complied with the substantive rules and were calculated correctly. Complainant's arguments surrounding the comparison between Conservice and Performance are all based on assumptions.³

City of Austin Water Bill for 7/15/19-8/14/19

Complainant repeatedly claims he was double billed for the City of Austin Water Bill for 7/15/19 to 8/14/19. However, he has not submitted any evidence that he was actually billed and billed correctly for this water bill by Performance or the previous property management company. Complainant cites only the service dates printed on the Performance statement as justification that this bill was billed to tenants. However, if this was actually correct, Performance would have had only three business days from the date the bill was printed by the City of Austin to receive the bill in the mail, calculate tenant charges, and issue tenants their billing statements. This would be an impressive timeline, however, no evidence has been submitted that this was actually accomplished. Furthermore, none of the charges on the bills issued to Complainant by Performance match any calculations issued to Complainant by Conservice on any billing statement or corrected billing summary, indicating that the bill was not double billed by Conservice or the Gallery.

³ See Item 119 Complainant's Initial Brief at page 30 titled "Assuming Performance Billing dates Matched the City of Austin's".

Respectfully Submitted,

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