



## Filing Receipt

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

**COMMISSION STAFF’S REQUEST FOR EXTENSION**

On December 14, 2020, Jeff Connors (Complainant) filed a formal complaint against the Gallery Apartments (Apartment), Roscoe Property Management (RPM), and Conservice (together, Respondents) regarding billing practices for water services. This complaint was filed under 16 Texas Administrative Code (TAC) § 22.242. On January 19, 2021, Complainant filed a Motion to Amend the Complaint. On February 3, 2021, the Respondents filed a response to the formal complaint. On February 3, 2021, Complainant filed a second Motion to Amend the Complaint. Complainant responded to the Respondents on February 9, 2021.

On September 14, 2021, the administrative law judge (ALJ) filed Order No. 9, requiring Staff to file a supplemental statement of position and address whether a summary decision or default order would be appropriate by October 4, 2021. Therefore, this pleading is timely filed.

**I. REQUEST FOR EXTENSION**

Pursuant to 16 Texas Administrative Code (TAC) § 22.4(b), Staff may request that the time allowed for filing any documents be extended for good cause. Staff issued requests for information (RFIs) to RPM on September 1, 2021. Pursuant to 16 TAC § 22.144(c), responses were due on September 21, 2021. On September 27, RPM filed a Rule 11 Agreement in which RPM and Staff agreed to extend RPM’s deadline to file its responses to Staff’s RFI until October 4, 2021. As of the time of this filing, RPM has not filed responses to Staff’s RFI. However, Staff has conferred with counsel for RPM and understands that RPM intends to file responses by October 4, 2021. Consequently, Staff requests additional time to review RPM’s responses to Staff’s RFIs, expected to be filed today. Staff respectfully requests that Staff’s deadline to file a supplemental statement of position be extended to October 25, 2021.

## **II. CONCLUSION**

Staff respectfully requests an order extending Staff's deadline to file a supplemental statement of position regarding the complaint to October 25, 2021.

Date: October 4, 2021

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 on October 4, 2021 in accordance with the Order Suspending Rules filed in Project No. 50664.

/s/ Phillip Lehmann  
Phillip Lehmann