



Control Number: 51619



Item Number: 3

Addendum StartPage: 0

RECEIVED

DOCKET NO. 51619

2021 JAN -6 PM 1:39

COMPLAINT OF JEFF  
CONNORS AGAINST THE  
GALLERY APARTMENTS,  
ROSCOE PROPERTY  
MANAGEMENT AND  
CONSERVICE

§  
§  
§

PUBLIC UTILITY  
COMMISSION OF TEXAS

**CONSERVICE'S RESPONSE TO ORDER NO. 1**

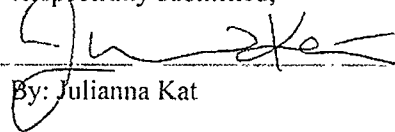
COMES NOW, CONSERVICE pursuant to 16 T.A.C. § 22.78 and Order No. 1 Requiring Responses to the Complaints of JEFF CONNORS ("Complainant") in the above-referenced proceeding, would respectfully show the Commission as follows:

**I. The Commission's Jurisdiction Over Conservice**

The Commission does not have jurisdiction over Conservice. 16 TAC §24.285 gives the Commission complaint jurisdiction over "an apartment house owner, condominium manager, manufactured home rental community owner, or other multiple use facility owner" that violates a commission rule. Conservice is a third-party utility billing company employed by the types of owners listed in §24.285 to allocate and bill tenants for their utility service charges but is not itself an owner as described in §24.285. Therefore, Conservice respectfully requests that it be dismissed from this proceeding.

Signed at San Diego, California the 6<sup>th</sup> day of January, 2021.

Respectfully submitted,



By: Julianna Kat

Conservice, LLC  
9950 Scripps Lake Dr. #101  
San Diego, CA 92131  
435-716-7374  
jkat@conservice.com  
**Representative for Conservice**