



## Filing Receipt

**Received - 2022-03-15 10:18:31 AM**  
**Control Number - 51619**  
**ItemNumber - 43**

**DOCKET NO. 51619**

<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 REFERRAL**

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 improper billing practices.<sup>1</sup> This complaint was filed under 16 Texas Administrative Code (TAC) § 22.242.

On September 14, 2021, the administrative law judge (ALJ) filed Order No. 10, requiring Staff (Staff) of the Public Utility Commission (Commission) to file a supplemental statement of position, addressing whether a summary decision or default order would be appropriate by October 25, 2021.

**I. COMMISSION STAFF’S REQUEST FOR REFERRAL**

On October 25, 2022, Staff filed a supplemental statement of position and request for referral to the State Office of Administrative Hearings (SOAH) for a hearing on the merits. Staff respectfully re-urges its request for referral.

**II. CONCLUSION**

Staff respectfully requests that this docket be referred to SOAH for a hearing on the merits.

---

<sup>1</sup> Complaint of Jeff Connors against The Gallery Apartments, Roscoe Property Management, and Conservice 1-69 (Dec. 14, 2020).

Date: March 15, 2022

Respectfully Submitted,

**PUBLIC UTILITY COMMISSION OF TEXAS  
LEGAL DIVISION**

Rachelle Nicolette Robles  
Division Director

Rustin Tawater  
Managing Attorney

/s/ Phillip Lehmann  
Phillip Lehmann  
State Bar No. 24100140  
1701 N. Congress Avenue  
P.O. Box 13326  
Austin, Texas 78711  
(512) 936-7385  
(512) 936-7268 (facsimile)  
[phillip.lehmann@puc.texas.gov](mailto:phillip.lehmann@puc.texas.gov)

**DOCKET NO. 51619**

**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 March 15, 2022 in accordance with the Order Suspending Rules filed in Project No. 50664.

/s/ Phillip Lehmann  
Phillip Lehmann