



## Filing Receipt

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**ItemNumber - 81**

**SOAH DOCKET NO. 473-22-2652.WS  
PUC DOCKET NO. 51619**

**INT OF JEFF CONNORS  
THE GALLERY  
ENTS, ROSCOE PROPERTY  
MENT, AND CONSERVICE**

**§  
§  
§  
§**

**BEFORE THE STATE OFFICE  
OF  
ADMINISTRATIVE HEARINGS**



**DIRECT TESTIMONY OF  
KATHRYN EILAND  
RATE REGULATION DIVISION  
PUBLIC UTILITY COMMISSION OF TEXAS  
NOVEMBER 28, 2022**

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### **ATTACHMENTS:**

Attachment KE-1	Calculation of Mr. Connor's Water and Wastewater Bills for service from August 14, 2019 through March 20, 2020
Attachment KE-2	Calculation on Interest
Attachment KE-3	Regulatory Resume
Attachment KE-4	List of Previous Testimonies

**I. INTRODUCTION OF WITNESS**

**Q. Please state your name and business address.**

A. My name is Kathryn Eiland. My business address is 1701 N. Congress Avenue, Austin, Texas 78711-3326.

**Q. By whom are you currently employed and in what capacity?**

A. I am employed by the Public Utility Commission of Texas (PUC) as a Regulatory Accountant in the Rate Regulation Division.

**Q. What are your principal responsibilities at the PUC?**

A. I am responsible for reviewing the following matters: formal complaints; applications to obtain or amend a certificate of convenience and necessity (CCN), wherein I specifically review the financial and managerial capability of the applicant; sale, transfer, or merger applications; rate change request applications; rate change appeals; and stock transfer applications. I am also responsible for preparing testimony and exhibits in contested case matters involving investor-owned water and sewer retail public utilities and assisting with settlement negotiations in those matters.

**Q. Please state your educational background and professional experience.**

A. I have provided a summary of my educational background and professional experience at Attachment KE-3.

**Q. Have you previously filed testimony before the PUC or the State Office of Administrative Hearings?**

A. Yes. I have provided a summary of my filed testimony in Attachment KE-4.

1  
2 **Q. On whose behalf are you testifying?**

3 A. I am testifying on behalf of Commission Staff.  
4

5 **II. PURPOSE AND SCOPE OF TESTIMONY**

6 **Q. What is the purpose of your testimony in this proceeding, Docket No. 51619,**  
7 ***Complaint of Jeff Connors against The Gallery Apartments, Roscoe Property***  
8 ***Management, and Conservice (Complaint)?***

9 A. The purpose of my testimony is to opine on The Gallery Apartments (Owner) and Roscoe  
10 Property Management, and Conservice's compliance with the PUC's rules with regard to  
11 allocation of water and wastewater utility charges provided to Jeff Connors (Mr. Connors)  
12 for the service period beginning August 14, 2019 through March 13, 2020. I will also  
13 recommend appropriate remedies for non-compliance and a refund amount to Mr. Connors.

14 **Q. What is the scope of your review in this proceeding?**

15 A. The scope of my review includes the complaint as filed by Mr. Connors, as well as the  
16 various documents submitted by the Owners.  
17

18 **Q. What standards did you apply?**

19 A. I applied the standards of 16 Texas Administrative Code (TAC) § 24.277 relating to  
20 Water Utility Submetering and Allocation (Owner Registration and Records); 16 TAC §  
21 24.279 relating to Water Utility Submetering and Allocation (Rental Agreement); 16 TAC  
22 § 24.281 relating to Water Utility Submetering and Allocation (Charges and Calculations);  
23 16 TAC § 24.283 relating to Water Utility Submetering and Allocation (Billing); and the  
24 Texas Water Code (TWC) §13.505 relating to Restitution.

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### III. COMPLIANCE WITH PUC RULES

**Q. Did the Owner comply with 16 TAC § 24.277(a), relating to registration requirements for owners that intend to bill tenants for submetered or allocated utility service or who change the method to bill tenants for utility service?**

A. Yes. The provisions of 16 TAC § 24.277(a) require that an owner who intends to bill tenants for submetered or allocated utility service or who changes the method used to bill tenants for utility service shall register with the PUC in a form that it prescribes. PUC records indicate that the Owner filed its *Registration of Sub metered or Allocated Utility Service* form (Form) for The Gallery II on November 12, 2018 in Project No. 47191.<sup>1</sup> On April 23, 2021, the Owner filed a new Form to change the method it bills tenants in Project No. 51613.<sup>2</sup> This Form identified the property as Motif South Lamar II.

**Q. What allocation method to bill tenants did the Owner chose on the Form filed in Project No. 47191?**

A. On the Form filed in Project No. 47191, the Owner selected the “Occupancy and size of rental unit 50 percent of the utility bill for water/wastewater consumption” allocation method. Under this method, the remainder is allocated according to either:

- the size of the tenant’s dwelling unit divided by the total size of all dwelling units, or
- the size of the space rented by the tenant of a manufactured home divided by the size of all rental spaces.

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<sup>1</sup> *Registration of Submetered or Allocated Utility Service for 2018*, Project No. 47191, Registration of Submetered or Allocated Utility Service – VM 3506 Manchaca LLC Fritz Barton III Sole Mbr, Item 1117 (Nov. 12, 2018).

<sup>2</sup> *Registration of Submetered or Allocated Utility Service for 2021*, Project No. 51613, Registration of Submetered or Allocated Utility Service – Motif South Lamar II. Item 247 (Apr. 23, 2021).

**Q. Did the allocation method change on the Form filed in Project No. 51613?**

A. Yes. On the Form filed in Project No. 51613, the Owner selected the estimated occupancy method to allocate utility charges. Under this method, the estimated occupancy for each unit is based on the number of bedrooms as shown in the table below. The estimated occupancy in the tenant's dwelling unit is divided by the total estimated occupancy in all dwelling units regardless of the actual number of occupants or occupied units.

Number of Occupants	Number of Occupants for Billing Purposes
0 (Efficiency)	1
1	1.6
2	2.8
3	4.0
>3	4.0 + 1.2 for each additional bedroom

**Q. What method did the Owner select to offset charges for common areas on the Form filed in Project No. 47191?**

A. On the Form filed in Project No. 47191, the Owner indicated that the property has an installed irrigation system that is not separately metered or submetered and that it would therefore deduct 25% of the retail public utility's total charges for water and wastewater consumption. Then, the Owner allocated the remaining charges among the tenants.

**Q. Did the common area method change on the Form filed in Project No. 51613?**

A. Yes. On the Form filed in Project No. 51613, the Owner indicated that the property has an installed irrigation system that is separately metered or submetered.<sup>3</sup> The Owner indicated

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<sup>3</sup> *Id.*

1 that it deducts the actual utility charges associated with the irrigation system, then deducts  
2 at least 5% of the utility's total charges for water and wastewater consumption.<sup>4</sup> The  
3 Owner indicated that it allocates the remaining charges among the tenants.<sup>5</sup>  
4

5 **Q. Is the allocation method selected on the Form filed in Project No. 47191 permitted**  
6 **under 16 TAC § 24.281(e)(2)?**

7 A. Yes. The allocation method selected on the Form is equivalent to the allocation method  
8 identified in 16 TAC § 24.281(e)(2)(iv).  
9

10 **Q. Is the allocation method selected on the Form filed in Project No. 51613 permitted**  
11 **under 16 TAC § 24.281(e)(2)?**

12 A. Yes. The allocation method selected on the Form is equivalent to the allocation method  
13 identified in 16 TAC § 24.281(e)(2)(iii).  
14

15 **Q. Did Mr. Connors request any records from the Owner that are addressed in 16 TAC**  
16 **§ 24.277(e)?**

17 A. Yes. In his complaint, Mr. Connors stated that in February 2020, he requested to review  
18 the water, drainage, and sewer bills covering a monthly billing period both before Roscoe  
19 Property Management began managing The Gallery II and afterwards.<sup>6</sup> Mr. Connors  
20 wanted to compare the two bills to determine the difference in common area charges  
21 between the time that Valiant Residential (Valiant), the former management company,  
22 administered the water bills and the period that Roscoe Property Management began

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<sup>4</sup> *Id.*

<sup>5</sup> *Id.*

<sup>6</sup> Complaint of Jeff Connors Against The Gallery Apartments, Roscoe Property Management, and  
Conservice at 3-4 (Dec. 14, 2020) (Formal Complaint).



1 providing billing services.<sup>7</sup>

2  
3 **Q. Did Mr. Connors make additional requests for records?**

4 A. Yes. Mr. Connors made additional requests for records three times from September to  
5 October, 2020 and once in mid-December 2020.<sup>8</sup>

6  
7 **Q. Did the Owner maintain its records and make its records available in accordance with**  
8 **the applicable requirements in 16 TAC § 24.277(e), (f) and (g)?**

9 A. No. The provisions of 16 TAC § 24.277(e), relating to Records, states in part:

10 the owner shall make the following records available for inspection  
11 by the tenant or the commission or commission staff at the on-site  
12 manager's office during normal business hours in accordance with  
13 subsection (g).

14 Subsections (e)(1) through (10) of 16 TAC § 24.277 list the records that the Owner is  
15 required to make available.<sup>9</sup> The Owner failed to make the records available. According  
16 to the Owner's response to the Complaint, the original complaint was never received by  
17 the Community Manager (the email went to a spam folder and they never saw it).<sup>10</sup> Mr.  
18 Connor made a total of five requests for the Owner to make the records available.<sup>11</sup>

19  
20 **Q. On January 5, 2021, did the Owner provide Mr. Connors with any information? If**  
21 **so, please describe the information.**

22 A. Yes. On January 5, 2021, the Owner provided the following to Mr. Connors:

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<sup>7</sup> *Id.*

<sup>8</sup> Motion to Amend the Complaint at 2 (Jan. 19, 2021).

<sup>9</sup> 16 TAC §§ 24.277(e)(1)–(10).

<sup>10</sup> "This is a secondary submission for [COMPLAINT No:CP2020101118 – Jeff Connors]" (AIS Item No. 10), at Email dated Jan. 5, 2022. (Feb. 3, 2021).

<sup>11</sup> Motion to Amend the Complaint at 2 (Jan. 19, 2021).

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- 1 • PUC rule 16 TAC § 24.281,
  - 2 • Multi-family Public Water and Wastewater rates,
  - 3 • Subchapter M, HIMBC Unit 2-239 (Conservance bills from October 2019 to January
  - 4 2021 with full explanation of water and sewer charges with calculations and figures
  - 5 used to calculate the bill),
  - 6 • Gallery Phase II Bills (City of Austin monthly water bills (water, wastewater, and
  - 7 drainage billing) to The Gallery II from 10/16/19 to 12/16/20).<sup>12</sup>

8

9 **Q. Did the information that the Owner provided to Mr. Connors satisfy his information**

10 **request?**

11 A. No. Because the Owner did not provide Mr. Connors all of the water billing information

12 that he requested and was entitled to review, which includes the total amount billed to

13 tenants each month for water/wastewater, it did not satisfy his request for information.<sup>13</sup>

14

15 **Q. Did the rental agreement between the Owner and Mr. Connors include all of the**

16 **information required under 16 TAC § 24.279, including written statements explaining**

17 **the Owner's billing for water and wastewater services?**

18 A. No. I reviewed Mr. Connors rental agreement with The Gallery dated February 1, 2019

19 and determined that it did not include all of the information required by 16 TAC § 24.279.

20 Specifically, the *Lease Addendum for Allocating Water/Wastewater Costs* did not provide

21 the following:

- 22 • The average monthly bill for all dwelling units in the previous calendar year and
- 23 the highest and lowest month's bills for that period;
- 24 • A clear description of the formula used to allocate utility services; and information
- 25 regarding billing such as the meter reading dates.

26

27 **Q. Did the Owner charge Mr. Connors for water and wastewater utility service**

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<sup>12</sup> *Id.*

<sup>13</sup> *Id.*

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**according to the allocation method selected in Project No. 47191 for service from August 14, 2019 through March 13, 2020?**

A. Based upon my review of the information provided in this proceeding, I was unable to recreate the charges for water and wastewater utility service that the owner charged Mr. Connors from August 14, 2019 through March 13, 2020. Therefore, I am unable to determine that the Owner allocated charges correctly.

**Q. Does Subchapter I, relating to Water Utility Submetering and Allocation, discuss billing for drainage, private hydrant fees, and water and sewer base fees?**

A. No. Subchapter I does not provide guidance related to the billing for drainage, private hydrant fees. and water and sewer base fees.

**Q. Did the Owner obtain Mr. Connor's agreement and provide notice as required by the provisions of 16 TAC § 24.279(c)?**

A. No. The Owner did not provide notice of the proposed change at least 35 days prior to implementing the new method. However, the new addendum indicated that the allocation method for calculating the bill would be based upon "subdivision (iii) average occupancy" (PUC average for number of bedrooms in unit).

**Q. Did the Owner comply with all applicable requirements of 16 TAC § 24.281 with respect to its water and wastewater billing charges?**

A. No. Under the requirements of 16 TAC § 24.281, before an owner may allocate the retail public utility's master meter bill for water and sewer service to the tenants, the owner shall first deduct:

(A) dwelling unit base charges or customer service charges, if applicable; and

(B) common area usage such as installed landscape irrigation systems, pools, and laundry rooms, if any, as follows:

- 
- (i) if all common areas are separately metered or submetered, deduct the actual common area usage;
- (ii) if common areas that are served through the master meter that provides water to the dwelling units are not separately metered or submetered and there is an installed landscape irrigation system, deduct at least 25% of the retail public utility's master meter bill;
- (iii) if all water used for an installed landscape irrigation system is metered or submetered and there are other common areas such as pools or laundry rooms that are not metered or submetered, deduct at least 5% of the retail public utility's master meter bill; or
- (iv) if common areas that are served through the master meter that provides water to the dwelling units are not separately metered or submetered and there is no installed landscape irrigation system, deduct at least 5% of the retail public utility's master meter bill.

**Q. Did the Owner provide evidence to indicate that the customer service fee was deducted from the water and wastewater charges before they were allocated?**

A. No.

**Q. Which provisions of 16 TAC § 24.281 did the Owner violate?**

A. The Owner violated rule 16 TAC § 24.281(c), which states:

**Customer service charge.** If the retail public utility's rate structure includes a customer service charge, the owner shall bill each dwelling unit the amount of the customer service charge divided by the total number of dwelling units, including vacant units, that can receive service through the master meter serving the tenants.

**Q. Was Mr. Connors was overbilled?**

A. Yes.

**Q. Did you calculate the amount of the refund due to Mr. Connors from the Owner and what standards did you apply?**

1 A. I applied the standards of TAC § 24.283(k), which states:

2 **Overbilling and underbilling.** If a bill is issued and subsequently  
3 found to be in error, the owner shall calculate a billing adjustment.  
4 If the tenant is due a refund, an adjustment must be calculated for all  
5 of that tenant's bills that included overcharges. If the overbilling or  
6 underbilling affects all tenants, an adjustment must be calculated for  
7 all of the tenants' bills. If the tenant was undercharged, and the cause  
8 was not due to submeter or point-of-use submeter error, the owner  
9 may calculate an adjustment for bills issued in the previous six  
10 months. If the total undercharge is \$25 or more, the owner shall offer  
11 the tenant a deferred payment plan option, for the same length of  
12 time as that of the underbilling. Adjustments for usage by a previous  
13 tenant may not be back billed to a current tenant

14 I also applied the standards of TWC § 13.505 (Restitution), which states, in part:

15 (a) In this section, "overcharge" means the amount, if any, a tenant  
16 is charged for submetered or nonsubmetered master metered utility  
17 service to the tenant's dwelling unit after a violation occurred  
18 relating to the assessment of a portion of utility costs in excess of  
19 the amount the tenant would have been charged under this  
20 subchapter.

21  
22 (c) If an apartment house owner, condominium manager,  
23 manufactured home rental community owner, or other multiple use  
24 facility owner violates a rule of the utility commission regarding  
25 utility costs, the person claiming the violation may file a complaint  
26 with the utility commission. The utility commission and State Office  
27 of Administrative Hearings shall establish an online and telephone  
28 formal complaint and hearing system through which a person may  
29 file a complaint under this subchapter and may appear remotely for  
30 a hearing before the utility commission or the State Office of  
31 Administrative Hearings. If the utility commission determines that  
32 the owner or condominium manager overcharged a complaining  
33 tenant for water or wastewater service from the retail public utility,  
34 the utility commission shall require the owner or condominium  
35 manager, as applicable, to repay the complaining tenant the amount  
36 overcharged.

37 Following these standards, I calculated a refund due to Mr. Connors of \$74.47.

38  
39 **Q. Should the Owners compensate Mr. Connors for interest based on all the months that**  
40 **he was overbilled?**

A. Yes. Using the PUC-approved interest rates for overbillings established in Project No. 45319,<sup>14</sup> I calculated the interest amount as documented in Attachment KE-2 which totals \$2.43 for August 2019 through November 2022.

**Q. Why method did you use to calculate interest?**

A. I calculated interest monthly based on the annual rate.

**Q. Why did you use this method to calculate interest?**

A. I used the compound interest method because it is allowed when electric utilities overcharge customers but do not correct the overcharge with three billing cycles of the error.

**Q. Please explain compound interest.**

A. Compound interest represents interest computed on the principal and any unpaid interest amount.

**Q. Please explain the determination of the monthly interest factor.**

A. The effective monthly interest factor is determined as follows:

$$x = (1+i)^{1/n} - 1$$

Where i = Commission-approved annual interest rate

x = effective monthly interest factor

n = number of periods (in months).

For example, the 2020 Commission-approved interest rate was 2.35%. The effective monthly interest factor for 2020 is determined as follows:

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<sup>14</sup> *Setting Interest Rates for Calendar Year 2019*, Project No. 45319, Order (Dec. 4, 2018); *Setting Interest Rates for Calendar Year 2020*, Project No. 45319, Order (Nov. 15, 2019); and *Setting Interest Rates for Calendar Year 2021*, Project No. 45319, Order (Nov. 19, 2020).

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1  $x = (1+0.0235)^{1/12}-1$

2  $x = (1.0235)^{1/12}-1$

3  $x = 1.001937552-1$

4  $x = 0.001937552$

5 **Q. Has the Owner refunded Mr. Connors any overbilled amounts?**

6 A. Yes. Mr. Connor received \$103.12 in bill credits for water service from March 18, 2021  
 7 through June 14, 2021.<sup>15</sup> Additionally, the Owner mailed Mr. Connors a check on  
 8 September 20, 2022 in the amount of \$85.06 for overcharges from August 2019 through  
 9 October 2020.<sup>16</sup>

10

11 **Q. If Mr. Connors was overbilled, did the overbilling affect all tenants, requiring an**  
 12 **adjustment to all tenants' bills in accordance with 16 TAC § 24.283(k)?**

13 A. Yes. It appears that an adjustment may be due to all tenants' bills due to the manner in  
 14 which the Owner calculated its charges to Mr. Connor for water and wastewater utility  
 15 service.

16

17 **Q. Did the Owner comply with all requirements of 16 TAC § 24.283 with respect to**  
 18 **rendering bills to tenants?**

19 A. No.

20

21 **Q. Which provisions did the owner violate?**

22 A. The owner did not comply with the following provision because the bills were not  
 23 timely rendered and delivered in accordance with 16 TAC § 24.283(b)(1) and

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<sup>15</sup> Motion to Amend Requested Relief (Oct. 11, 2021).

<sup>16</sup> The Gallery Apartments and Roscoe Property Management's Motion to Dismiss (Sep. 28, 2022).

(d)(1). Additionally, the bills reflected a due date that was less than 16 days after they were mailed or hand delivered to the tenant, which is not in accordance with 16 TAC § 24.283(b)(1). The provisions of 16 TAC § 24.283(b)(1) provide the following:

**Rendering bill.** (1) Allocated bills shall be rendered as promptly as possible after the owner receives the retail public utility bill.

The provisions of 16 TAC § 24.283(d)(1) state:

**Billing period.** (1) Allocated bills shall be rendered for the same billing period as that of the retail public utility, generally monthly, unless service is provided for less than that period.

**Q. Do the bills that the Owner issued to Mr. Connors clearly state that the utility service is allocated as required by 16 TAC § 24.283(f)?**

A. No. The bills issued to Mr. Connor did not clearly state that the utility service is allocated.

**Q. Do the bills that the Owner issued to Mr. Connors provide appropriate information as required by 16 TAC § 24.283(f)(1) through (4)?**

A. According to the standards of 16 TAC § 24.283(f)(1) through (4):

**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



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1 payment is to be made.

2 The owner provided an incomplete response to Staff RFI 1-5 and Staff RFI 1-6<sup>17</sup>: it did not  
3 provide a copy of each bill for water and sewer service issued to Mr. Connors for the eight-  
4 month period in dispute. Subsequent bills that it provided indicate the bills do not include  
5 the total amount due to customer service charges.  
6

7 **Q. Did Mr. Connors dispute the bills at issue with the Owner?**

8 A. Yes. The information Mr. Connors provided in this Complaint indicates that he contacted  
9 The Gallery as early as February 28, 2020. He requested that The Gallery provide all  
10 available billing information to him. His request included the formula that was used to  
11 calculate his bill in June 2019 as well as how it was billed at that time by Roscoe Property  
12 Management. Furthermore, Mr. Connors requested to review the amount of money that  
13 the Owner paid for the common areas in June 2019 and at the time of his request.<sup>18</sup>  
14

15 **Q. Did the Owner conduct a timely investigation of any bills disputed by Mr. Connors**  
16 **and report the results to him in accordance with 16 TAC § 24.283(l)?**

17 A. Based upon my review of the Complaint, there is no evidence in the record to indicate the  
18 Owner conducted a timely investigation of the written dispute or that the Owner reported  
19 the results of the investigated to Mr. Connors in writing within 30 days.  
20

21 **Q. If the Gallery Apartments, Roscoe Property Management, or Conservice did not**  
22 **comply with PUC rules or the Texas Water Code, what is the appropriate remedy?**

23 A. The Owner should refund Mr. Connors the amount overbilled of \$74.47. The Owner  
24 should also pay Mr. Connors all accrued interest on this amount, which as of November

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<sup>17</sup> Attachment A, Attachment B, Attachment C, Attachment D, Attachment E, Attachment C (Oct. 4, 2021).

<sup>18</sup> Formal Complaint at 56.

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1 30, 2022 totals, \$2.43. Together, the total amount owed is \$76.90. Further, I recommend  
2 that the Owner be ordered to review all of its water and wastewater billing practices to  
3 ensure that they comply with 16 TAC Subchapter I, Water Utility Submetering and  
4 Allocation, regardless of whether they were discussed in this testimony. I recommend that  
5 the Owner be ordered to file a compliance report detailing the steps taken to alleviate the  
6 violations.

7  
8 **Q. If you do not address an issue or position in your testimony, should that be interpreted**  
9 **as your support for the Owner's position on that issue?**

10 A. No. The fact that I do not address an issue in my testimony should not be construed as  
11 agreeing, endorsing, or consenting to any of the Owner's positions.

12  
13 **Q. Does this conclude your direct testimony?**

14 A. Yes. I reserve the right to supplement this testimony during the proceeding as new  
15 evidence is presented.

**Kathryn Eiland**

Public Utility Commission of Texas  
1701 North Congress Avenue  
Austin, TX 78711-3326

**REGULATORY EXPERIENCE:**

Financial Analyst, Rate Regulation Division,  
Public Utility Commission of Texas  
Employed: February 1, 2018, to present.

Duties: Review formal complaints, certificate of convenience and necessity (CCN) applications and amendments, sale/transfer/merger applications, requests for authority to change rates, stock transfers, and financial and managerial reviews. Prepare testimony and exhibits for contested case matters involving investor-owned water and sewer retail public utilities and assisting with settlement negotiations.

Investigator IV/Team Lead, Complaints Section  
Public Utility Commission of Texas, Customer Protection Division (CPD)  
Employed: March 2016 – January 2018

Duties: Investigated and responded complex complaints and communicated findings to customers and service providers, reviewed and resolved complaint appeals submitted by customers or service providers, attended meetings with service provider representatives and Commission staff, represented agency at external functions and trainings, contributed to Legislative requests and inquiries, handled walk-in complaints and inquiries, identified, researched and reviewed trends within the industry and provided status reports to management, assisted Oversight and Enforcement with possible enforcement actions by providing information on informal complaints, acted as a team lead for Investigators in the absence of management, reviewed the investigative process and made improvement recommendations as appropriate, trained and mentored CPD staff, served on backup team for agency receptionist.

Investigator I, III, Complaints Section  
Public Utility Commission of Texas, Customer Protection Division  
Employed: July 2002 – March 2016

Duties: reviewed and processed customer complaints, inquiries and opinions, analyzed complaint issues and service provider responses, determined proper resolution of complaints and communicated findings to customers and service providers, handled customer and utility concerns from government officials and senior agency staff, participated in agency workshops and special projects with other agency divisions, coordinated and maintained record keeping system, served on backup team for agency receptionist.

**EDUCATION:**

October 2019	NARUC Eastern Rate School
June 2019	Utility Finance and Accounting for Financial Professionals
Seminar	
May 1994	Jackson State University, Jackson, MS
	Bachelor of Business Administration in Business
Administration	

**List of Testimony****Docket****Case**

PUC 48572

SOAH 473-19-0420.WS

Complaint of Ashutosh Sharma Against the Palmer  
at Las Colinas Apartment Homes

PUC 48571

SOAH 473-19-2460

Application of the City of San Marcos to Amend a  
Sewer Certificate of Convenience and Necessity in  
Hays, Guadalupe, and Caldwell Counties

PUC 49887

SOAH 473-20-1116.WS

Application of Kendall West Utility, LLC for  
Authority to Change Rates

PUC 49261

SOAH 473-20-1120.WS

Complaint of Michael E. Moore Against C Willow  
Water Company

PUC 50200

SOAH 473-20-1120.WS

Application of Undine Texas, LLC and Undine  
Texas Environmental, LLC for Authority to Change  
Rates

PUC 50367

SOAH 473-20-3820.WS

Complaint of Chad Swahn Against Shady Oaks  
Water Supply Company, LLC

PUC 48697

SOAH 473-20-1117.WS

Application of Anderson Water Company, Inc. for  
Authority to Change Rates

PUC 48819

SOAH 473-20-1674.WS

Application of Northtown Acres Water Supply for  
Authority to Change Rates

PUC 50197

SOAH 473-21-2237.WS

Application of Timbercrest Partners LLC for  
Authority to Change Rates

The following files are not convertible:

Attachment KE-1.51619JeffConnors.xlsx

51619 - Jeff Connors Interest

Calculation.Attachment KE-2.xlsx

Please see the ZIP file for this Filing on the PUC Interchange in order to access these files.

Contact [centralrecords@puc.texas.gov](mailto:centralrecords@puc.texas.gov) if you have any questions.