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DOCKET NO. 51619 SOAH DOCKET NO. 473-22-2652

COMPLAINANT FIRST REQUEST FOR INFORMATION TO KATHRYN EILAND

12/16/22

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COMPLAINT OF JEFF CONNORS § PUBLIC UTILITY COMMISSION

AGAINST THE GALLERY §

APARTMENTS, ROSCOE PROPERTY § OF TEXAS

MANAGEMENT, AND CONSERVICE §

COMPLAINANT FIRST REQUEST FOR INFORMATION TO KATHRYN EILAND

Pursuant to 16 Texas Administration Code (TAC) § 22.144, Jeff Connors (Complainant) requests that Kathryn Eiland, a Financial Analyst at the PUC's Rate Regulation Division, provides the following information under oath. The inquiries shall be answered in sufficient detail to fully present all of the relevant facts, within the time limit provided by the Presiding Officer or within 20 days, if the Presiding Officer has not provided a time limit. Please copy the inquiry immediately above the answer to it. These inquiries are continuing in nature, and if there is a relevant change in circumstances, submit an amended answer, under oath, as a supplement to your original answer.

Provide responses to the Requests for Information by filing with the Commission solely through the Interchange on the Commission's website and provide notice, by email, to all other parties that the pleading or document has been filed with the Commission, unless otherwise ordered by the presiding officer pursuant to the Order Suspending Rules in Docket No. 50664.

Respectfully Submitted,

/s/Jeff Connors

Jeff Connors

Complainant

INSTRUCTIONS

- 1) Pursuant to 16 TAC § 22.144 (c)(2), Complainant requests that answers to the requests for information be made under oath.
- 2) Please copy the question immediately above the answer to each question. State the name of the witness in this cause who will sponsor the answer to the question and can vouch for the truth of the answer.
- 3) These questions are continuing in nature, and if there is a relevant change in circumstances, submit an amended answer, under oath, as a supplement to your original answer.
- 4) Words used in the plural shall also be taken to mean and include the singular. Words used in the singular shall also be taken to mean and include the plural.
- 5) The present tense shall be construed to include the past tense, and the past tense shall be construed to include the present tense.
- 6) If any document is withheld under any claim of privilege, please furnish a list identifying each document for which a privilege is claimed, together with the following information: date, sender, recipients or copies, subject matter of the document, and the basis upon which such privilege is claimed.
- 7) Pursuant to 16 TAC § 22.144 (g)(4), if the response to any request is voluminous, please provide a detailed index of the voluminous material.
- 8) Complainant requests that each item of information be made available as it is completed, rather than upon completion of all information requested.

INQUIRY

<u>Background</u>: When I refer to Items in Docket 51619, I am referring only to the pdf files in the Items in the Docket and not any material in the Item's ZIP folder.

RFI 1-1: Please list the Items in Docket 51619 that were submitted by the Complainant, Jeff Connors, that you read in their entirety.

RFI 1-2: Please list the Items in the Docket 51619 that were submitted by the Complainant, Jeff Connors, that you took into consideration when you did your Written Testimony found in Item 81 of the Docket that was submitted on 11/28/22.

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I will email kathryn.eiland@puc.texas.gov, frontdesk@roscoeproperties, stephanie.laird@rpmliving.com, jaime.hearn@rpmliving.com, jkat@conservice.com, edmunds@hooverslovacek.com, liu@hooverslovacek.com, and phillip.lehmann@puc.texas.gov to inform them of this submission to the docket.

Respectfully submitted,

Jeff Connors

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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 December 16, 2022 in accordance with the Order Suspending Rules filed in Project No. 50664.

/s/ Jeff Connors Jeff Connors Complainant