



Control Number: 49429



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PUC DOCKET NO. 49429
SOAH DOCKET NO. 473-19-5675



COMPLAINT OF JARED COWAN

§

PUBLIC UTILITY COMMISSION

§

AGAINST

§

OF TEXAS

§

DICKENS COURT HOA, INC.

§

OBJECTION TO REQUEST FOR EXTENSION AND SUPPORTING DOCUMENTATION

COMES NOW, JARED COWAN, and files following objection to the request made by Dickens Court Homeowners Association, Inc. (hereinafter referred to as "DCT") to extend the time allowed to recalibrate meters.

- 1) DCT has failed to identify the nine (9) companies with whom they claim to have submitted bid requests.
- 2) DCT has failed to provide supporting documentation regarding their claim that these vendors were "unable to coordinate calibration at this time".¹
- 3) There has been no open meeting discussion of this electrical meter issue.
- 4) Absent presenting a copy of the solicitation letters DCT has not shown any evidence of attempting to solicit bids as alleged.
- 5) There has been no communication with homeowners regarding this issue.
- 6) There has been no notice to homeowners regarding DCT board approval and acceptance of the bid from Meter Techs, LLC. on May 4, 2020.
- 7) The letter from Meter Techs, LLC. ambiguously states "We hope to have the equipment back and ready to test in the near future"²
- 8) No clear outline, schedule or expectation of DCT plans to comply with the PUC order has been communicated to the PUC, myself, or any member of DCT.
- 9) The only reason I have knowledge of the status of this issue is **NOT** because I am a homeowner but rather the legal requirements of DCT to inform the complainant of documents filed with the PUC.
- 10) As a result of this legal notification I subsequently reached out to our management company Houston HOA Management and asked for the quote from Meter Techs, LLC.
- 11) The attached quote from Meter Techs, LLC (Attachment "A") states "Service is only for calibration."
- 12) The attached quote from Meter Techs, LLC (Attachment "A") states "These devices may be in need of repair in order to operate correctly."
- 13) The attached quote from Meter Techs, LLC states "(Attchment "A") This one time fee of \$2525.00 is for calibration or attempt to calibrate if meter is not working."

¹ Docket Item 49429_51_1065991, Page 4

² Docket Item 49429_51_1065991, Page 2

- 14) Meter Techs, LLC.'s letter does not offer an opinion as to whether they will be able to successfully recalibrate the meters. In fact, the language implies doubt by expressing the devices "may be in need of repair".
- 15) Again, there is no clear path toward the goal of complying with PUC orders or substantive rules.
- 16) If DCT can propose an additional step to achieve compliance in the event of an unsuccessful calibration attempt by the end of the requested extension this objection will be withdrawn.

In the end DCT has not been able to demonstrate a clear path to success to come into compliance with PUC substantive rules. Their current course of action does not comport to the clear direction given by Mr. Josh Kovar.³ Given the thirty-eight (38) year age of these electro-mechanical meters it is unreasonable to believe that attempted calibration alone is a solution. Grease dries out, gears wear down, Current Transformers (CT's) become less accurate.

It is my belief that DCT is intentionally pursuing an unrealistic course of action and asking for an extension only to delay potential liability due to their lack of action over the past two (2) years.

Sincerely,



Jared Cowan
7918 Prestwood Dr. #14
Houston, TX 77036
jjared@medbeyond.com
281.658.6972

CERTIFICATE OF SERVICE

The undersigned hereby certifies that a true and correct copy of these Writings and Recordings by Jared Cowan, has been forwarded to Defendant Dickens Court Homeowners Association, Inc., on this 15th day of May 2020, as indicated below:

Dickens Court HOA, Inc.
c/o Sears | Bennett | Gerdes | LLP
6548 Greatwood Pkwy.
Sugar Land, TX 77479
713.782.1788

Sarah@searsfirm.com

Public Utility Commission of Texas
Central Records
ATTN: Filing Clerk
1701 N. Congress Avenue
P.O. Box 13326
Austin, TX 78711-3326

Express Mail and via email to
John.Harrison@puc.texas.gov



Jared Cowan – 05/15/2020

ATTACHMENT “A”

Meter Techs LLC

4026 Melody Pond Way
Arlington, TX 76005

Houston HOA Management

Dickens Court
7918 Prestwood
Houston, Texas 77036

Quote #1090

Phone (469)774-2676
Email nwutility@msn.com

PRODUCT / SERVICE	DESCRIPTION	QTY.	UNIT COST	TOTAL
Meter Service	Calibrate Osaki electric meters. Service is only for calibration. These devices may be in need of repair in order to operate correctly. This project does not include repair or re-wiring of devices. This one time fee of \$2525.00 is for calibration or attempt to calibrate if meter is not working.	1	\$2,525.00	\$2,525.00

Total **\$2,525.00**

This quote is valid for the next 30 days, after which values may be subject to change.