

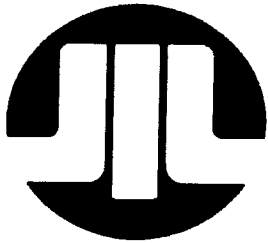


Control Number: 45522



Item Number: 796

Addendum StartPage: 0



**THE MICHELSON
ORGANIZATION**

7701 Forsyth Boulevard, Suite 900
St. Louis, Missouri 63105
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45522

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PUBLIC UTILITY COMMISSION
ST. LOUIS, MO

June 7, 2016

To Whom It May Concern,

We manage Boulder Creek Apartments, located at 12330 Vance Jackson Rd, San Antonio, TX. Boulder Creek has 400 apartment homes and was constructed in 2010. The community was originally built with sub-metering devices to track water usage and currently use them to bill accordingly.

Unfortunately, we have had a number of meters that have had issues: not reporting due to faulty transmitters, needing meters replaced, and only being able to pass on 83% of our **eligible** water and sewer charges to our residents due to contestant issues. The current value being lost due to these continuous issues is approximately \$20,000 annually, reducing our communities value by close to **\$450,000**.

These types of issues and repairs have been going on for years since warranty expired and the cost to repair them is not feasible. Due to these constant equipment failures, repairs, and lost revenue **we are requesting permission to switch from sub-metered billing to an allocated method of billing our residents their water bills**. I have referenced verbiage from the PUC's Rules and Regulations pertaining to this request at the below.

Boulder Creek Apartments uses the TAA Bluemoon lease and has forms available that will allow us to provide the proper documentation to the residents.

Chapter 24. Substantive Rules Applicable to Water and Sewer Service Providers

Subchapter H. Water utility Sub-metering and Allocation

24.123. Rental Agreement

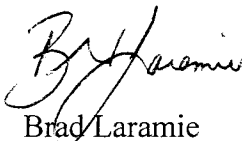
(d) Change from sub-metered to allocated billing. An owner shall not change from sub-metered billing to allocated billing, except after receiving written approval from the commission after a demonstration of good cause and if the rental agreement requirements under subsections (a), (b), and (c) of this section have been met. Good cause may include:

(1) equipment failures; or

(2) meter reading or billing problems that could not feasibly be corrected

Shall you have any questions, please feel free to contact me directly at 636-428-0395 or laramie@michelsonrealty.com.

Sincerely,


Brad Laramie

756