

Control Number: 47191



Item Number: 199

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PUBLIC UTILITY COMMISSION  
February 14, 2018

**COLONY LAKES APARTMENTS**

**1000 Farrah Lane  
Stafford, TX 77477**

Docket #  
47191

Executive Director  
Texas Public Utility Commission  
Attention: Records  
William B. Travis Building  
1701 N. Congress Avenue, 7<sup>th</sup> Floor  
Austin, Texas 78701

*Re: Preserve at Colony Lakes Apartments  
1000 Farrah Lane, Stafford, TX 77477*

Sent via certified mail

Dear Sir/Madam:

In accordance with Texas Public Utility Commission ("PUC") Rule 24.123(d) entitled "Change from Submetered to Allocated Billing" this correspondence and the accompanying exhibits shall serve as a formal request by Preserve at Colony Lakes Apartments ("Colony Lakes") to convert from sub-metering billing to allocated or RUBS billing. Colony Lakes contends there is "good cause" for the PUC to approve this conversion request as demonstrated herein.

The water sub-meters at Colony Lakes are over twelve (12) years old. Since last fall Colony Lakes has experienced continuous systematic failure of the water sub-metering system. As demonstrated by the attached Property Summary Reports the number of inoperable water sub-meters has increased from 52 units for the billing period of 09/19/17 – 10/18/17 to 95 units for the billing period of 11/20/17 – 12/19/17. As of the date of this request, the number of inoperable water sub-meters is now 114. *(See copy of Property Summary Reports attached hereto as Appendix Exhibit 1)*

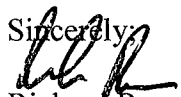
During this period of time Colony Lakes has had representatives of various water sub-metering companies visit the property to provide immediate and long term solutions for the water sub-metering system. Due to the age of the water sub-metering system it was determined that trying to fix the current system would result in spending thousands of dollars in ad-hoc repairs with no guarantees that the system would remain operable for any period of time. Instead, the best recommendation is to install a new water sub-metering and AMR system at a projected cost of one hundred forty three thousand six hundred and forty dollars (\$143,640.00). *(See copy of water sub-metering replacement proposal attached as Appendix Exhibit 2)*

Though Colony Lakes understands the advantage of billing its residents per a water sub-metering methodology, replacing the current system will create undue economic hardship for the owners of Colony Lakes. Simply put, Colony Lakes does not have the economic

means to replace the water sub-metering system. Consequently, Colony Lakes is respectfully requesting the PUC approve the request to convert from a water sub-metering methodology to an allocate methodology; conditional on Colony Lakes fulfilling all of the requirements set forth in PUC Rule 24.123, including but not limited to providing notice to its residents and obtaining their written approval.

Please advise if you have any questions or need any additional information. My contact information is (905) 717-8264.

Sincerely,



Richard Roos

Encl: Property Summary Report  
Installation Proposal

# CRS Property Schedule 184

Reported as of 02/13/2018

## Colony Lakes(TX4CL) - Property Summary

[1] This is the total number of apartments excluding down units  
 [2] This is the number of vacant units at the start of the billing period  
 [3] This is the occupancy at the start of the billing period  
 [4] This is the number of apartments billed either by allocating, submetering, estimated due to faulty a meter or estimated on their SODA  
 [5] Soda estimates are counted in the total number of apartments billed for the period

Number of apartments [1] 420  
 Total Sq/Ft of apartments 385,548

Cost Type	Period Start	Period End	Occupancy % [3]	# of Apartments Billed in the Period [4]	# Current Residents Estimated (due to meter problem)	# Residents Estimated on SODA [5]	Median Resident Bill	Maximum Resident Bill	# Current Residents Excluded because not enough history to estimate	# Residents Excluded because all charges were waived	# Residents Excluded due to no CRS mappings
Water	09/19/2017	10/18/2017	95.20%	412	52	23	\$23.50	\$30.11	0	0	0
Water	09/19/2017	10/18/2017	95.20%	412	52	23	\$23.50	\$30.11	0	0	0
Other Fees	09/19/2017	10/18/2017	95.20%	411	52	22	\$1.76	\$19.36	0	0	0
Other Fees	09/19/2017	10/18/2017	95.20%	411	52	22	\$1.76	\$19.36	0	0	0

## Colony Lakes(TX4CL) - Cost Type Recovery Summary

[1] This represents the period that spans the billing periods of all invoices for the specific cost type  
 [2] This is the amount that we have CRS mappings defined for (as of the date when the schedule was created) and can therefore potentially bill back to residents  
 [3] Deductions are only made for charges allocated using the following allocation methods: Occupancy, Occupancy + Sqft, Average Occupancy, Sqft  
 [4] This also includes estimated amounts for faulty meter reads

Cost Type	Period Start	Period End	Days in period [1]	Invoice Total	Allocable Amount [2]	Common Area Deduction % [3]	Common Area deduction	Subsidy	Net Allocable	Amount Allocated / Submetered [4]	Amount Estimated on SODAs	Amount waived	Recovery of Invoice Total %	Recovery of Allocable %
Water	09/19/2017	10/18/2017	30	\$9,870.00	\$9,870.00	0.00%	-	-	\$9,870.00	\$8,972.48	\$396.37	-	94.92%	94.92%
Other Fees	09/19/2017	10/18/2017	30	\$1,291.12	\$1,053.67	0.00%	-	-	\$1,053.67	\$883.19	\$35.34	-	71.14%	87.17%

## Colony Lakes(TX4CL) - Charge Summary

[1] This is the potential allocable amount based on the latest mappings as of the date this schedule was created. Please note existing residents with old mappings may have costs billed as different charges  
 [2] This is the amount billed to current residents i.e. excludes previous residents  
 [3] This is the % of residents billed the charge relative to all current residents billed in this schedule

Cost Type	Charge	Potential Allocable [1]	Current Schedule				Prior Schedule				Difference to Prior Schedule		
			Amount Billed [2]	Calculated Unit Rate	Number of residents billed	Penetration % [3]	Amount Billed [2]	Calculated Unit Rate	Number of residents billed	Penetration % [3]	Amount Billed	Calculated Unit Rate	Penetration %
Water	Wastewater Charges	\$6,300.00	\$5,727.31	\$0.000000	391	100.00%	\$5,628.70	\$0.000000	391	100.00%	\$98.61	\$0.000000	0.00%
Water	Water Charges	\$5,578.20	\$3,245.17	\$0.000000	391	100.00%	\$3,189.76	\$0.000000	391	100.00%	\$55.41	\$0.000000	0.00%
Other Fees	Drainage	\$997.56	\$329.46	\$0.000680	391	100.00%	\$909.64	\$0.000680	390	99.74%	\$(80.18)	\$0.000000	0.26%
Other Fees	State-Imposed TCEQ Fee	\$56.11	\$53.73		391	100.00%	\$51.62		389	99.49%	\$2.11		0.51%

## CRS Property Schedule 185

Reported as of 02/13/2018

### Colony Lakes(TX4CL) - Property Summary

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Number of apartments [1] 420  
 Total Sq/Ft of apartments 385,548

Cost Type	Period Start	Period End	Occupancy % [3]	# of Apartments Billed in the Period [4]	# Current Residents Estimated (due to meter problem)	# Residents Estimated on SODA [5]	Median Resident Bill	Maximum Resident Bill	# Current Residents Excluded because not enough history to estimate	# Residents Excluded because all charges were waived	# Residents Excluded due to no CRS mappings
Water	10/18/2017	11/20/2017	96.70%	405	86	23	\$23.50	\$32.17	1	0	0
Water	10/18/2017	11/20/2017	96.40%	405	96	23	\$23.50	\$32.17	1	0	0
Other Fees	10/18/2017	11/20/2017	96.70%	404	86	22	\$2.03	\$12.17	1	0	0
Other Fees	10/18/2017	11/20/2017	96.40%	404	86	22	\$2.03	\$12.17	1	0	0

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 [4] This also includes estimated amounts for faulty meter reads

Cost Type	Period Start	Period End	Days in period [1]	Invoice Total	Allocable Amount [2]	Common Area Deduction % [3]	Common Area deduction	Subsidy	Net Allocable	Amount Allocated / Submetered [4]	Amount Estimated on SODAs	Amount waived	Recovery of Invoice Total %	Recovery of Allocable %
Water	10/18/2017	11/20/2017	34	\$9,870.00	\$9,870.00	0.00%	-	-	\$9,870.00	\$9,051.22	\$440.86	-	98.17%	98.17%
Other Fees	10/18/2017	11/20/2017	34	\$1,333.91	\$1,169.33	0.00%	-	-	\$1,169.33	\$979.12	\$40.14	-	76.41%	87.17%

### Colony Lakes(TX4CL) - Charge Summary

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Cost Type	Charge	Potential Allocable [1]	Current Schedule				Prior Schedule				Difference to Prior Schedule		
			Amount Billed [2]	Calculated Unit Rate	Number of residents billed	Penetration % [3]	Amount Billed [2]	Calculated Unit Rate	Number of residents billed	Penetration % [3]	Amount Billed	Calculated Unit Rate	Penetration %
Water	Wastewater Charges	\$6,300.00	\$5,777.40	\$0.000000	385	100.00%	\$5,727.31	\$0.000000	391	100.00%	\$50.09	\$0.000000	0.00%
Water	Water Charges	\$6,181.20	\$3,273.82	\$0.000000	385	100.00%	\$3,245.17	\$0.000000	391	100.00%	\$28.65	\$0.000000	0.00%
Other Fees	Drainage	\$1,112.48	\$926.20	\$0.000680	384	99.74%	\$829.46	\$0.000680	391	100.00%	\$96.74	\$0.000000	-0.26%
Other Fees	State-Imposed TCEQ Fee	\$58.85	\$52.92		385	100.00%	\$53.73		391	100.00%	\$(0.81)		0.00%

# CRS Property Schedule 186

Reported as of 02/13/2018

## Colony Lakes(TX4CL) - Property Summary

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 [4] This is the number of apartments billed either by allocating, submetering, estimated due to faulty a meter or estimated on their SODA  
 [5] Soda estimates are counted in the total number of apartments billed for the period

Number of apartments [1] 420  
 Total Sq/Ft of apartments 355,548

Cost Type	Period Start	Period End	Occupancy % [3]	# of Apartments Billed in the Period [4]	# Current Residents Estimated (due to meter problem)	# Residents Estimated on SODA [5]	Median Resident Bill	Maximum Resident Bill	# Current Residents Excluded because not enough history to estimate	# Residents Excluded because all charges were waived	# Residents Excluded due to no CRS mappings
Water	11/20/2017	12/19/2017	95.20%	403	95	19	\$23.50	\$23.50	24	0	0
Water	11/20/2017	12/19/2017	95.00%	403	95	19	\$23.50	\$23.50	24	0	0
Other Fees	11/20/2017	12/19/2017	95.20%	403	95	19	\$1.96	\$53.39	24	0	0
Other Fees	11/20/2017	12/19/2017	95.00%	403	95	19	\$1.96	\$53.39	24	0	0

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 [4] This also includes estimated amounts for faulty meter reads

Cost Type	Period Start	Period End	Days in period [1]	Invoice Total	Allocable Amount [2]	Common Area Deduction % [3]	Common Area deduction	Subsidy	Net Allocable	Amount Allocated / Submetered [4]	Amount Estimated on SODAs	Amount waived	Recovery of Invoice Total %	Recovery of Allocable %
Water	11/20/2017	12/19/2017	30	\$9,870.00	\$9,870.00	0.00%	-	-	\$9,870.00	\$8,718.28	\$326.15	-	91.64%	91.64%
Other Fees	11/20/2017	12/19/2017	30	\$1,679.44	\$1,619.82	0.00%	-	-	\$1,619.82	\$985.50	\$35.86	-	60.82%	63.05%

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Water	Wastewater Charges	\$6,300.00	\$5,565.20	\$0.000000	388	100.00%	\$5,777.40	\$0.000000	385	100.00%	\$(212.20)	\$0.000000	0.00%
Water	Water Charges	\$6,558.70	\$3,153.08	\$0.000000	388	100.00%	\$3,273.82	\$0.000000	385	100.00%	\$(120.74)	\$0.000000	0.00%
Other Fees	Drainage	\$1,556.82	\$929.11	\$0.000810	364	93.81%	\$926.20	\$0.000880	384	99.74%	\$2.91	\$0.000130	-5.93%
Other Fees	State-Imposed TCEQ Fee	\$63.00	\$56.39		387	99.74%	\$52.92		385	100.00%	\$3.47		-0.26%



December 29, 2017

## Installation Proposal

Venterra Realty Management  
1725 16<sup>th</sup> Avenue, Suite 201  
Richmond Hills, ON  
(905) 764-5940

Dear Edward,

Thank you in advance for allowing Minol the opportunity to present this submetering proposal for Preserve at Colony Lakes.

Minol pioneered the submetering industry more than 60 years ago. Today, we offer a broad range of metering and installation services for electric, water and gas. With Minol's Installation Program you can take confidence in knowing that our technicians are highly-trained in the latest metering technologies. Our team can service and manage virtually any existing meter system, as well as retrofit properties for metering services. The Minol Service Team is the second largest, in-house field operations team, servicing and maintaining more than 750,000 meter points each month nationwide.

Minol understands that you have many choices when it comes to choosing a utility management company. We have built upon our continued success in the submetering industry to develop additional programs that maximize recovery across all areas of your business:

### Meter Installation and Maintenance

☐ Electric ☐ Gas ☐ Water

### Utility Billing Solutions

☐ Convergent Billing ☐ Electronic Data Exchange ☐ Online Reporting and Account Access ☐ Ongoing Regulatory Compliance

### Energy Management

☐ Bill Auditing and Analysis ☐ Bill Payment ☐ Vacant Unit Cost Recovery ☐ Budget Planning

### Water Conservation

☐ Water Saving Components Installation ☐ Recovery Analysis ☐ Pay Out of Savings

### Property Management Software - Resman®

☐ Fully-Integrated Property Management and Billing Solution ☐ Complete Portfolio Management

We look forward to an opportunity to work with you in establishing a Submetering Program that is best suited for you. Please contact me at your earliest convenience for further information or to answer any questions you may have.

Sincerely,

Justen Brown  
Regional Sales Manager, North Texas and Oklahoma  
**Minol USA**  
15280 Addison Road  
Suite 100  
Addison, Texas 75001

972.386.6611 x 463 | toll free 888.766.1253 x 463  
Cell: 214.697.2254 | jsbrown@minolusa.com

### Measure- Manage- Recover- Conserve

15280 Addison Road, Suite 100 ☐ Addison, TX 75001 ☐ Phone: 888.766.1253 ☐ Fax: 972.386.7711 ☐ minolusa.com



*All that counts.*

## **Minol Installation Proposal – Retrofit – (TX) Water Submetering and AMR Reading System**

The following represents our proposed scope of work for Preserve at Colony Lake, located in Stafford, Texas:

### **Minol Responsibilities:**

- Furnish 420 3/4" Master Meter Poly FAM water meters for a Full Capture application, for installation by the plumber. Plumber will remove existing meters and install new meters.
- Furnish/Install the Inovonics AMR Network – consisting of 1 Data Collector, 11 Repeaters and 420 Wireless Transmitters.
- Furnish 420 Meter Couplings, for installation by the plumber.
- Programming and Installation of all the data collection system components, including connecting and mounting transmitters to the meters, repeaters, and the data collector.
- All testing and troubleshooting to insure system integrity.
- Inventory report listing unit number, tenant space, and corresponding equipment serial numbers.
- Coordination of system specifications and requirements with Project Management and other subcontractors.

### **Client/Owner Responsibilities:**

- Provide designated interior space for water meters. Please see specification sheets for dimensional details. If meters are to be installed in ceilings, they must be located directly above access panels and with a minimum of 16" x 16" opening for access.
- Provide secure and environmentally controlled location and adequate space to install the data collector (*typically located in a manager's office, or mechanical/phone room*).
- Provide an Internet connection via Ethernet port for the data collector. Monthly connection charges related to communication are the responsibility of the Client. (*if internet is not available, a **dedicated analog** phone line will be required*)
- Provide 120-VAC **dedicated outlet for each Repeater** located in the attic/breezeway access where Minol has advised repeaters are to be located.
- Provide a complete and accurate listing of unit and building numbers – this is necessary for the programming of transmitters and identification of all meters and transmitters to specific units.
- Licensing, fees, permits, and any state assessed inspection fees (initial and/or reoccurring) are the responsibility of the Client/Owner.

### **The Plumber will Provide/Install: (Minol provided Plumbing Subcontractor)**

- A plumbing loop with sufficient length, clearance and support to accommodate the meter and couplings installation in a horizontal orientation. See attached specifications.
- Transition fittings for connecting the threaded meter couplings to the piping.
- Installation of the meters and meter couplings (supplied by Minol, Inc.) in the plumbing loop – Absolutely no pipe dope or plumbing tape is to be used on the threaded ends of meter couplings during installation.
- If needed, installation of a cutoff valve on the supply side of each meter allowing shut-off of water prior to installation of meter. **Note: This is not included in the pricing and will be an extra to the contract amount.**
- 

### **Exclusions:**

- Plumbing, electrical permits or bonds.
- Valve replacement if necessary.
- Removal and draining of hot water tank and/or removal of washer/dryer to access meter location.
- Cutting and covering of walls if necessary.
- Installation of Back Flow Preventers, if applicable.





*All that counts.*

**Price:**

Submetering and AMR Reading System Installation for the property named Preserve at Colony Lakes:

**\$342.00\* per unit for 420 units for a total cost of \$143,640.00\***

**(Contract Amount includes State Use Tax)**

**The above pricing is provided for budgetary purposes only  
and is subject to change pending a site visit/survey.**

The pricing quoted above is in effect for 30 days. The pricing includes only items listed above and may be subject to modification following a site visit and installation consultation by a Minol representative. The pricing excludes applicable sales tax, permit and licensing fees, and any additional fees not itemized above. All prior negotiations or discussions involving pricing proposals are null and void. Minol reserves the right to amend, modify, or withdraw this proposal at any time, without notice, prior to acceptance by Client. If Client requires use of its own contract, any timeline requirements for contract execution requested by the Client will not be acceptable or adhered to by Minol.

Accepted by:

\_\_\_\_\_  
Client/Agent for Client

\_\_\_\_\_  
Minol

\_\_\_\_\_  
Print Name

\_\_\_\_\_  
Print Name

\_\_\_\_\_  
Date

\_\_\_\_\_  
Date

**About Minol**

Founded in 1952, Minol is the third largest Metering, Billing, Conservation and Energy Management provider with 2,500 employees and 32 offices worldwide. We are a privately held, family-owned company with a 60-year history of innovative metering technologies and consumption based billing of gas, electric, water and heating costs. As the third largest utility billing provider, our global team produces more than 5.4 million bills annually for 30,000 clients.

We operate in all major markets providing services for more than 300,000 in the multifamily and military markets, as well as commercial properties and government agencies.

We are proud to have achieved positive, strategic growth throughout our history. By partnering with Minol, you can be confident that you are our priority. We will constantly strive to maximize the value of your investment by continually identifying improvements and developing new opportunities that enhance your investment.