



Control Number: 47191



Item Number: 58

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PUBLIC UTILITY COMMISSION  
FILING CLERK

1/26/2018

Public Utility Commission of Texas  
1701 N Congress PO Box 13326  
Austin, Texas 78711-3326

47191

Re: Marq on Burnet – Change to Allocated Billing

Dear Ms. Benter:

This letter was prepared in anticipation of obtaining your approval for a change from submetered billing to an approved allocation billing method pursuant to Texas Water Code, Subchapter M, Sec. 13.502 (e) (1) and (2).

The Marq on Burnet apartment community, which is located at 6701 Burnet Road is comprised of 343 dwelling units that have individual water submeters installed. Regrettably, an error occurred during the installation of the submeters as the current installation location is only capturing the consumption of the residential cold water consumption. This error occurred during construction in 2015. CWS didn't purchase the property until 12/1/2016. As a result, the residential submeters are not capturing the hot usage, which is fed into each unit through an independent and separate pipe without a submeter attached to it. Unfortunately, it is not economically feasible for us at this time to install new meters in each unit in order to also capture the hot water consumption, which could total approximately \$300 per unit.

Therefore, we respectfully request your approval of a change from submetered billing to an approved allocation method due to the considerable capital that would be involved in replacing the un-serviceable submetering system. We will adhere to the additional Public Utility Commission ("PUC") requirements if our request is approved, which includes the following under reference Subchapter H, § 24.123(c).

1. We shall provide to all tenants a new lease addendum or other written agreement which provides for the allocation method, in this case a method based on Cold Water Allocation.
2. We shall provide to all tenants a 35-day prior written notice advising tenants of the proposed change.

We trust the information we have provided to the PUC is sufficient in detail as to warrant approval of a change to an approved allocation method of billing. However, in the event you require additional information, please feel free to contact me.

Respectfully,

Janna Joseph  
CWS Apartment Homes, LLC

CWS Apartment Homes, LLC. : Web: [www.cwsapartments.com](http://www.cwsapartments.com) : Email: [critter@cwsapartments.com](mailto:critter@cwsapartments.com)

Mail: 9606 N. Mopac Expy, Austin, Texas 78759 : Phone: 512-837-3028

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## Registration of Submetered OR Allocated Utility Service

NOTE: Please **DO NOT** include any person or protected information on this form (ex: tax identification #'s, social security #'s, etc.)

Date: \_\_\_\_\_  
By: \_\_\_\_\_  
Docket No. \_\_\_\_\_  
(this number to be assigned by the  
PUC after your form is filed)

**PROPERTY OWNER:** Do not enter the name of the owner's contract manager, management company, or billing company.

Name							
Mailing Address:		City		State		Zip	
Telephone# (AC)		Fax # (if applicable)					
E-mail							

### NAME, ADDRESS, AND TYPE OF PROPERTY WHERE UTILITY SERVICE IS PROVIDED

Name	Marq on Burnet							
Mailing Address:	6701 Burnet Road		City	Austin	State	TX	Zip	78757
Telephone# (AC)	512-267-5223		Fax # (if applicable)					
E-mail	marqonburnet@cwsapartments.com							

☒ Apartment Complex    ☐ Condominium    ☐ Manufactured Home Rental Community    ☐ Multiple-Use Facility

If applicable, describe the "multiple-use facility" here:

### INFORMATION ON UTILITY SERVICE

Tenants are billed for ☒ Water ☒ Wastewater    ☐ Submetered **OR** ☒ Allocated ★★★

Name of utility providing water/wastewater    City of Austin

Date submetered or allocated billing begins (or began)    1/26/2018    Required

### METHOD USED TO OFFSET CHARGES FOR COMMON AREAS    Check one line only.

☐ Not applicable, because    ☐ Bills are based on the tenant's actual submetered consumption  
☐ There are neither common areas nor an installed irrigation system

☐ **All common areas and the irrigation system(s) are metered or submetered:**

We deduct the actual utility charges for water and wastewater to these areas then allocate the remaining charges among our tenants.

☐ **This property has an installed irrigation system that is not separately metered or submetered:**

We deduct  percent (**we deduct at least 25 percent**) of the utility's total charges for water and wastewater consumption, then allocate the remaining charges among our tenants.

☒ **This property has an installed irrigation system(s) that is/are separately metered or submetered:**

We deduct the actual utility charges associated with the irrigation system(s), then deduct at least 5 percent of the utility's total charges for water and wastewater consumption, then allocate the remaining charges among our tenants.

☐ **This property does not have an installed irrigation system:**

We deduct at least 5 percent of the retail public utility's total charges for water and wastewater consumption, and then allocate the remaining charges among our tenants.

### ★★★IF UTILITY SERVICES ARE ALLOCATED, YOU MUST ALSO COMPLETE PAGE TWO OF THIS FORM ★★★

Send this form by mail with a total of (3) copies to:

Filing Clerk, Public Utility Commission of Texas

1701 North Congress Avenue

P.O. Box 13326

Austin, Texas 78711-3326

## METHOD USED TO ALLOCATE UTILITY CHARGES

Check the box or boxes that describe the allocation method used to bill tenants.

<input type="checkbox"/>	<b>Occupancy method:</b> The number of occupants in the tenant's dwelling unit is divided by the total number of occupants in all dwelling units at the beginning of the month for which bills are being rendered.
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<input type="checkbox"/> <b>Ratio occupancy method:</b>  The number of occupants in the tenant's dwelling unit is adjusted as shown in the table to the right. This adjusted value is divided by the total of these values for all dwelling units occupied at the beginning of the retail public utility's billing period.	<b>Number of Occupants</b>	<b>Number of Occupants for Billing Purposes</b>
	1	1.0
	2	1.6
	3	2.2
	>3	2.2 + 0.4 for each additional occupant

<input type="checkbox"/> <b>Estimated occupancy method:</b>  The estimated occupancy for each unit is based on the number of bedrooms as shown in the table to the right. 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.	<b>Number of Bedrooms</b>	<b>Number of Occupants for Billing Purposes</b>
	0 (Efficiency)	1
	1	1.6
	2	2.8
	3	4.0
	>3	4.0 + 1.2 for each additional bedroom

<input type="checkbox"/> <b>Occupancy and size of rental unit</b>	<input type="text"/>	percent (in which no more than 50%) of the utility bill for water/wastewater consumption is allocated using the occupancy method checked above. The remainder is allocated according to either:
<ul style="list-style-type: none"> <li>the size of the tenant's dwelling unit divided by the total size of all dwelling units, <b>OR</b></li> <li>the size of the space rented by the tenant of a manufactured home divided by the size of all rental spaces.</li> </ul>		

<input type="checkbox"/>	<b>Submetered hot water:</b>
The individually submetered hot water used in the tenant's dwelling unit is divided by all submetered hot water used in all dwelling units.	

<input checked="" type="checkbox"/>	<b>Submetered cold water is used to allocate charges for hot water provided through a central system:</b>
The individually submetered cold water used in the tenant's dwelling unit is divided by all submetered cold water used in all dwelling units.	

<input type="checkbox"/>	<b>As outlined in the condominium contract.</b> Describe:

<input type="checkbox"/>	<b>Size of manufactured home rental space:</b>
The size of the area rented by the tenant divided by the total area of all the size of rental spaces.	
<input type="checkbox"/>	<b>Size of the rented space in a multi-use facility:</b>
The square footage of the space rented by the tenant divided by the total square footage of all rental spaces.	