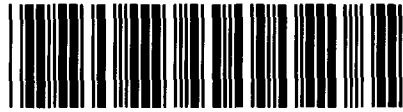




Control Number: 47191



Item Number: 923

Addendum StartPage: 0

47191

Public Utilities Commission of Texas
Attn: Filing Clerk, Central Records
1701 N Congress Avenue
PO Box 13326
Austin, TX 78711-3326

RECEIVED

2010 SEP -4 AM 11:44

PUBLIC UTILITY COMMISSION
FILING CLERK

Re: Application for Approval to Waive Submeter Requirement and Permit Allocated Billing for McDermott Park

To Whom It May Concern:

Please accept this letter and supplemental information as application for approval from the Public Utility Commission of Texas ("Commission") to waive the submeter requirement for purposes of water quantity measurement for McDermott Park, located at 8312 Angels Drive, Plano, TX 75024 ("the Property"), and permit allocated billing pursuant to P.U.C. SUBST. R. 24.123(d). The rule requires that a property owner obtain written approval from the Commission in order to switch from a submetered water/sewer billing method to an approved allocation method. Further, the owner must follow all rental agreement requirements under the rules and demonstrate good cause to switch methods, including equipment failures, meter reading, or billing problems that cannot feasibly be corrected (P.U.C. SUBST. R. 24.123(d)(1)(2)).

While the Property was built in 2017, the installed submeters only measure consumption on the cold water lines. The additional cost to install a hot water submeter for each unit would be approximately \$17,400.00, and unfortunately such financial commitment is not feasible for the Property at this time. Under submetering, we will only be able to bill residents of McDermott Park for a portion of their water/sewer consumption. In order to bill the residents for their full water/sewer consumption, our best option is to switch to an allocation method based upon the individually submetered cold water usage. As such, we are seeking Commission approval to allocate water/sewer charges in this manner.

Should the Commission approve the switch in billing methodology from the submetered method requirement to an allocation method for the Property, all required residential notices and lease documentation will be provided to the residents at least 35 days prior to implementation as required. Our third party billing provider will implement a common area deduction based on the Property's common area characteristics in accordance with the rules. Upon receipt of approval, we will then file a revised registration form with the Commission reflecting the allocation method and common area deduction.

We hope the Commission finds the information provided herein helpful in demonstrating good cause to switch permitted billing methods. We are confident that the market-rate residents of our community will be able to maintain greater control over their level of water/sewer charges through this approval rather than costs being included in their rent. Should the Commission have any further questions or concerns, please contact me at your earliest convenience. We appreciate the Commission's time and effort in looking into this matter and look forward to receipt of a response.

Respectfully submitted,



Patricia Mims, Senior Manager
McDermott Park Senior Living, LTD
8312 Angels Drive
Plano, TX 75024
pmims@porticopm.com

923

1914



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 | McDermott Park Senior Living, LTD

Mailing Address: | 6119 Greenville Ave., Suite 134 | City | Dallas | State | TX | Zip | 75206

Telephone # | (972) 849-1065 | Fax # (if applicable) | () | E-mail | cthomas@porticopm.com

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

Name | McDermott Park

Mailing Address: | 9312 Angels Dr. | City | Plano | State | TX | Zip | 75024

Telephone # | (972) 987-5170 | Fax # (if applicable) | () | E-mail | pmlms@porticopm.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 Plano

Date submetered or allocated billing begins (or began) | 08/01/2018 | Required S1313

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 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"/>	Occupancy method: 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.
--------------------------	--

<input type="checkbox"/> Ratio occupancy method: 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.	Number of Occupants	Number of Occupants for Billing Purposes
	1	1.0
	2	1.6
	3	2.2
	>3	2.2 + 0.4 for each additional occupant

<input type="checkbox"/> Estimated occupancy method: 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.	Number of Bedrooms	Number of Occupants for Billing Purposes
	0 (Efficiency)	1
	1	1.6
	2	2.8
	3	4.0
	>3	4.0 + 1.2 for each additional bedroom

<input type="checkbox"/> Occupancy and size of rental unit	<input type="checkbox"/> 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: • the size of the tenant's dwelling unit divided by the total size of all dwelling units, OR • the size of the space rented by the tenant of a manufactured home divided by the size of all rental spaces.
---	--

<input type="checkbox"/>	Submetered hot water: 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"/>	Submetered cold water is used to allocate charges for hot water provided through a central system: 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"/>	As outlined in the condominium contract. Describe:

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