



Control Number: 48454



Item Number: 34

Addendum StartPage: 0

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2019 OCT 23 11:07
PUBLIC UTILITY COMMISSION
OF TEXAS

COMPLAINT OF NZINGA HUGHES §
AGAINST THE TRAILS AT DOMINION §
PARK, AB-GO TRAILS AT DOMINION §
PARK PROPCO, LLC, NWP SERVICES §
CORPORATION, HARRIS COUNTY §
MUNICIPAL UTILITY DISTRICT NO. §
215, AND GOLDOLLER REAL ESTATE §
INVESTMENTS §

PUBLIC UTILITY COMMISSION
OF TEXAS

REALPAGE RESPONSE TO COMMISSION STAFF

COME NOW RealPage Utility Management, Inc. (fka NWP Service Corporation), Trails at Dominion Park, Ab-Go Trails at Dominion Park Propco, LLC and GoldOller Real Estate Investments ("Respondents") in response to Commission Staff's fourth request for information to RealPage Utility Management, Inc.

ANSWERS TO COMMISSION STAFF'S QUESTION NOS. STAFF 4-1 THROUGH STAFF 4-6

Staff 4-1: Provide the number of Occupants in all dwelling units from June 216 to July 2018 for each month.

Answer 4-1: The below chart includes the total occupancy used for billing purposed for each month. Revenue Month indicates the month in which the resident statements are generated and mails. Occupancy indicates the total number of occupants in all dwelling units. Occ Factor indicates the total occupancy using the occupancy factors as outlined in §24.281 (e)(2)(ii). We included this number as this is the basis for billing and simply providing the occupancy would not be beneficial.

24

Revenue Month	Occupancy	Occ Factor
May-16	1085	967.4
Jun-16	1097	979.8
Jul-16	1117	996.6
Aug-16	1104	985.2
Sep-16	1117	990.6
Oct-16	1122	998.2
Nov-16	1134	1006.2
Dec-16	1118	988.6
Jan-17	1137	1004.4
Feb-17	1136	1002.4
Mar-17	1137	1003.6
Apr-17	1145	1009.8
May-17	1178	1035.2
Jun-17	1090	1024.4
Jul-17	1176	1033.2
Aug-17	1172	1030.2
Sep-17	1198	1045.2
Oct-17	1203	1049.6
Nov-17	1205	1051.4
Dec-17	1220	1065.6
Jan-18	1191	1042.8
Feb-18	1191	1040
Mar-18	1205	1052.4
Apr-18	1204	1047.6
May-18	1234	1069.4
Jun-18	1205	1048.6
Jul-18	1195	1039.6
Aug-18	1231	1067.8

Staff 4-2: Indicate whether the Trails at Dominion Park, (Trails) or RealPage contacted North Harris County MUD #215 (District) when monthly bills were not received for May 2015, August 2015, October 2015, February 2016, August 2016, December 2016, April 2017, May 2017, July 201[7], August 2017, September 2017, November 2017, December 2017, March 2018 and April 2018.

Answer 4-2: We have been reviewing records for attempts to obtain missing or delayed invoices, but are unaware of specific attempts to contact the District for the missing invoices. As explained in the initial response (PUC Docket 48454, Item 4), in order to continue the monthly billing on a consistent schedule, the property invoices were estimated based on the prior invoices received. As this is a requirement for the billing practice, the only option to continue to bill on a monthly basis is to estimate the expense.

Staff 4-3: Indicate whether the Trails paid the District for each of the above months in #2.

Answer 4-3: Records indicate that all invoices were paid by Trails, including the periods listed in #2 above.

Staff 4-4: Provide proof of payment to the District for each of the above months in #2.

Answer 4-4: Attached as Exhibit 4-4 are payment records for the months requested. Some financial information has been redacted for the protection of the account holder.

Staff 4-5 Provide documentation, such as the rate schedule approved by the District, of water base charged billed by the District from July 2016 to July 2018.

Answer 4-5: The billing methods utilities by the District are not posted online and are not described in any material included in the billings. As such, there is no way to determine how the District calculates charges unless they are contacted directly. When it was discovered that the invoices from the District included single water lines and single sewer lines, RealPage actively contacted the District to gain more information. After several phone calls and emails, the District shared the following images to help explain how they determine charges. While unable to confirm with any online documentation, it appears the same rate structure is currently in place.

3.06. Monthly Rates for Water Service to Apartments. The following rates per month, or any part thereof, shall be charged per unit for water service to Apartment units served by separate meters:

- | | | |
|-----|--|----------|
| (a) | Minimum monthly charge for up to 2,000 gallons of water metered | \$ 13.50 |
| (b) | For each 1,000 gallons of water metered over 2,000 gallons and up to 4,000 gallons | \$ 1.75 |
| (c) | For each 1,000 gallons of water metered over 4,000 gallons and up to 6,000 gallons | \$ 2.25 |
| (d) | For each 1,000 gallons of water metered over 6,000 gallons | \$ 2.75 |

Apartment units served by a master meter shall be charged as follows: The total number of gallons metered shall be divided by the number of apartment units to determine the average usage per unit. The average usage per unit shall be rounded up to the nearest 1,000 gallons for purposes of computing the amount to be charged hereunder. The rates specified above shall then be applied to such average usage to determine the charge per unit. The charge per unit shall then be multiplied by the applicable number of Apartment units to determine the total amount to be charged.

Staff 4-6 Provide documentation, such as the rate schedule approved by the District, of sewer base charged billed by the District from July 2016 to July 2018.

Answer 4-6: As described above, upon discovery of the base fees included in the single sewer lines on the District invoices, RealPage contacted the District for further information. Unlink the water bill, RealPage was not provided the above image for sewer, but RealPage was told what the rates were as follows:

- Minimum Monthly Charge for up to 4,000 gallons of water metered: \$13.50
- For each additional 1,000 gallons of water metered over 4,000 gallons: \$1.50

Respectfully submitted,



Jeffrey Peterson

2201 Lakeside Blvd
Richardson, TX 75082
Jeffrey.Peterson@RealPage.com

**Representative for
RealPage Utility Management, Inc.
(fka NWP Service Corp) and,
Trails at Dominion Park and,
Ab-Go Trails at Dominion Park Propco, LLC and,
GoldOller Real Estate Investments**

CERTIFICATE OF SERVICE

I, Jeffrey Peterson – Vice President Legal Counsel, certify that a copy of this document was serviced on all parties of record in this proceeding on October 7, 2019 in the following manner:
fax, hand-delivery, first class mail and/or Overnight delivery.


Jeffrey Peterson

Exhibit 4-4

THIS CHECK HAS A COLORED BACKGROUND AND CONTAINS MULTIPLE SECURITY FEATURES—SEE BACK FOR DETAILS

AB-GO Trails at Dominion Park LLC

1628 JFK Blvd
Suite 1600
Philadelphia, PA 19103
267-322-5600

Signature Bank
565 Fifth Avenue
12th Floor
New York, NY 10017

1278
Date: 05/19/2015

Pay To
The Order of Harris County MUD 215

Twenty Seven Thousand Seven Hundred Eighty Seven Dollars

\$**27,787.00**

Harris County MUD 215
312 Spring Hill Dr., Suite 100
Spring, TX 77386

[Handwritten Signature]



SECURITY FEATURES LISTED BELOW EXCEED INDUSTRY STANDARDS

SECURITY FEATURE	DESCRIPTION OF BENEFIT
Watermark	Visible from both sides of the check
Color Shifting Ink	Changes color when viewed from different angles
Microprint	Small text that is difficult to reproduce
Security Thread	Embedded in the paper, visible from both sides
Color Shifting Ink	Changes color when viewed from different angles
Microprint	Small text that is difficult to reproduce
Security Thread	Embedded in the paper, visible from both sides

Original Document

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ENDORSE HERE

The Trails at Dominion Park
8 Penn Center, 1628 JFK Blvd., Suite 1600
Philadelphia PA 19103

PAYMENT REFERENCE
0000-0677:123456785011DP0000046

CHECK NO.
0000279041

60-180
433

DATE OF CHECK
09/02/15

Void In 60 Days

PAY: THIRTY SIX THOUSAND SEVEN HUNDRED SEVENTEEN AND 08/100 DOLLARS

CHECK AMOUNT
\$36,717.06

TO THE ORDER OF Harris County MUD 215
312 Spring Hill Dr., Suite 100
Spring TX 77386

Silicon-Valley Bank
Pittsburgh, PA

Neil F. Fucile
Authorized Signature

⑈000027904⑈

20150911008589134221309

995878341

PAY TO THE ORDER OF
COMPASS BANK
HOUSTON, TX 77002-6936
113010547
FOR DEPOSIT ONLY
HARRIS COUNTY MUD 215
LOCKBOX CLEARING ACCOUNT
6720379773

20150911008589134221309

THIS CHECK HAS A SECURITY BURGLAR AND COUNTERFEIT PROOF FEATURES. SEE BACK FOR DETAILS.

AB-GO Trails at Dominion Park LLC

1628 JFL Blvd
Philadelphia, PA 19103
287-322-9800

Signature Bank
128th Avenue
New York, NY 10017

1654
Date: 10/20/2015

Pay To
The Order of Harris County MUD 215

Forty Three Thousand Ten Dollars and 96 Cents

\$**43,010.96**

Harris County MUD 215
596 Spring Hill Drive
Spring Hill, TN 37286



⑆001654⑆

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X _____ **MP**

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Document

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Heat Sensitive Lock Icon	Responds to heat. Ink will fade when heated (150° F).
Toner-Anti-Fraud	Chemical reacts to the heat of the toner to the document when toner is applied.
True Watermark	Watermark appears on paper when held to light.
Phosphor Fluorescence	Fluoresces under ultraviolet light.
Chemical Reactions	Chemical reacts to the heat of the toner when applied.
Colorful Background	Colorful pattern, visible when held to light.
Warning Reveal	Reveals the word "VOID" when the document is held to light.
Micro Printing	Micro printing, visible when held to light.
Security Hologram	Back side of the document features a security hologram.

The Trails at Dominion Park
8 Penn Center, 1628 JFK Blvd., Suite 1600
Philadelphia PA 19103

PAYMENT REFERENCE

0000-0677:0000501100345

CHECK NO.
0000379640

80-100
433

DATE OF CHECK

02/20/16

Void in 60 Days

PAY: THIRTY FIVE THOUSAND SIX HUNDRED EIGHTEEN AND 12/100
DOLLARS

CHECK AMOUNT

\$35,618.12

TO THE ORDER OF Harris County MUD 215
PO Box 1689
Spring TX 77383

Silicon Valley Bank
Pittsburgh, PA


Authorized Signature

⑈0000379640⑈

20160302009074420921309

20160302009074420921309

PAY TO THE ORDER OF
COMPASS BANK
HOUSTON, TX 77002-6998
11:30:10SA7
FOR DEPOSIT ONLY
HARRIS COUNTY MUD 215
LOCKBOX CLEARING ACCOUNT
678307973

The Trails at Dominion Park
8 Penn Center, 1628 JFK Blvd., Suite 1600
Philadelphia PA 19103

PAYMENT REFERENCE

0000-0677:0000501100748

CHECK NO.
0000511836

00-100
433

DATE OF CHECK

08/23/16

Void In 60 Days

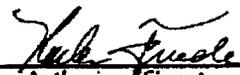
PAY: FORTY FOUR THOUSAND NINE HUNDRED FIFTY ONE AND 68/100
DOLLARS

CHECK AMOUNT

\$44,951.68

TO THE ORDER OF Harris County MUD 215
PO Box 1689
Spring TX 77383

Silicon Valley Bank
Pittsburgh, PA


Authorized Signature

⑈0000511836⑈

PAY TO THE ORDER OF
COMPASS BANK
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113010547
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LOCKBOX CLEARING ACCOUNT
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CHECK NO.
0000614442

60-100
433

DATE OF CHECK

12/21/16

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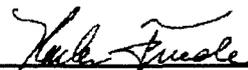
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\$44,534.02

PAY: FORTY FOUR THOUSAND FIVE HUNDRED THIRTY FOUR AND 02/100
DOLLARS

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Spring TX 77383

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Pittsburgh, PA


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PAYMENT REFERENCE
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707937

60-16C

DATE OF CHECK
04/25/17

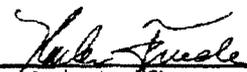
PAY: FORTY FOUR THOUSAND ONE HUNDRED ELEVEN AND 86/100 DOLLARS

VOID IN 60 DAYS

CHECK AMOUNT
\$44,111.86

TO THE ORDER OF Harris County MUD 215
PO Box 1689
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Pittsburgh, PA


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PAYMENT REFERENCE
0000-0677:0000501101319

CHECK NO.
745013

60-160/4

DATE OF CHECK
06/14/17

PAY: SIXTY ONE THOUSAND EIGHTY FOUR AND 02/100 DOLLARS

VOID IN 60 DAYS

CHECK AMOUNT
\$61,084.02

TO THE ORDER OF Harris County MUD 215
PO Box 1689
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Pittsburgh, PA


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20170819 2 0154

The Trails at Dominion Park
107 South 2nd Street
Philadelphia PA 19106

PAYMENT REFERENCE
0000-0677:0000501101323

CHECK NO.
748484

60-160A

DATE OF CHECK
06/17/17

PAY: FIFTY THREE AND 74/100 DOLLARS

VOID IN 60 DAYS

CHECK AMOUNT
\$53.74

TO THE ORDER OF Harris County MUD 215
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Spring TX 77383

Silicon Valley Bank
Pittsburgh, PA

Mark Fuesle
Authorized Signature

⑈0000748484⑈



Vertical text within a rectangular box, possibly a stamp or label, containing several lines of illegible characters.

20170622 6 0153

The Trails at Dominion Park
107 South 2nd Street
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PAYMENT REFERENCE
0000-0677:0000501101333

CHECK NO.
758139

60-1604

DATE OF CHECK
06/30/17

PAY: FORTY ONE THOUSAND NINETY ONE AND 58/100 DOLLARS

VOID IN 60 DAYS

TO THE ORDER OF Harris County MUD 215
PO Box 1689
Spring TX 77383

CHECK AMOUNT
\$41,091.58

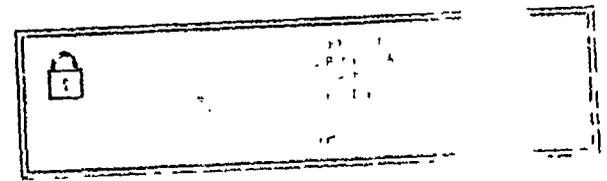
Silicon Valley Bank
Pittsburgh, PA


Authorized Signature

⑈0000758139⑈

PAY TO THE ORDER OF
COMPASS BANK
HOUSTON, TX 77002-6336
113010547
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LOCKBOX CLEARING ACCOUNT
6720379773

20170705 26 0158



The Trails at Dominion Park
4 Executive Blvd., Suite 100
Suffern NY 10901

PAYMENT REFERENCE
0000-0677:0000501101438

CHECK NO.
797456

60-180

DATE OF CHECK
08/18/17

PAY: FIFTY FOUR THOUSAND FIVE HUNDRED FIFTY AND 89/100 DOLLARS

VOID IN 60 DAYS

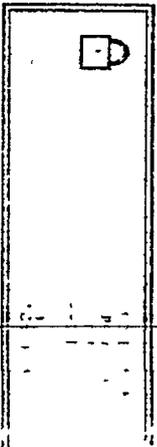
CHECK AMOUNT
\$54,550.89

TO THE ORDER OF
Harris County MUD 215
PO Box 1689
Spring TX 77383

Silicon Valley Bank
Pittsburgh, PA

Neil Fucile
Authorized Signature

⑈0000797456⑈



28179822 3-8169

The Trails at Dominion Park
4 Executive Blvd., Suite 100
Suffern NY 10901

PAYMENT REFERENCE
0000-0677:0000501101513

CHECK NO.
826139

60-1604

DATE OF CHECK
09/23/17

PAY: FORTY NINE THOUSAND ONE HUNDRED SIXTY FIVE AND 88/100 DOLLARS

VOID IN 60 DAYS

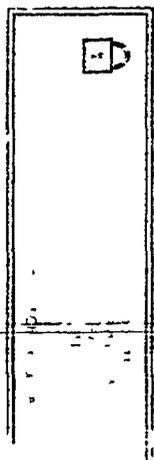
CHECK AMOUNT
\$49,165.88

TO THE ORDER OF Harris County MUD 215
PO Box 1689
Spring TX 77383

Silicon Valley Bank
Pittsburgh, PA


Authorized Signature

⑈0000826139⑈



20170929-3-0048

The Trails at Dominion Park
107 S 2nd Street
Philadelphia PA 19106

CHECK NO. -
859474

60-160/4

PAYMENT REFERENCE
0000-0677:0000501101590

DATE OF CHECK
10/31/17

PAY: TWELVE AND 50/100 DOLLARS

VOID IN 60 DAYS

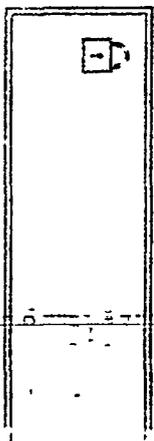
CHECK AMOUNT
\$12.50

TO THE ORDER OF Harris County MUD 215
PO Box 1689
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Silicon Valley Bank
Pittsburgh, PA


Authorized Signature

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2017.11.03 2 0194

The Trails at Dominion Park
107 S 2nd Street
Philadelphia PA 19106

CHECK NO.
879678

66-429

PAYMENT REFERENCE

0000-0677:0000501101621

DATE OF CHECK

11/22/17

PAY: EIGHT HUNDRED SEVENTY ONE AND 55/100 DOLLARS

VOID IN 60 DAYS

CHECK AMOUNT

\$871.55

TO THE ORDER OF

Harris County MJD 215
PO Box 1689
Spring TX 77383

Silicon Valley Bank
Pittsburgh, PA

Karla Friele
Authorized Signature

⑈0000879678⑈

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DATE OF CHECK
11/22/17

PAY: FIFTY THOUSAND FIFTY THREE AND 12/100 DOLLARS

VOID IN 60 DAYS

TO THE ORDER OF Harris County MUD 215
PO Box 1689
Spring TX 77383

CHECK AMOUNT
\$50,053.12

Silicon Valley Bank
Pittsburgh, PA

Val Frisole
Authorized Signature

⑈0000880220⑈

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The Trails at Dominion Park
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CHECK NO.
928676

60-1607

DATE OF CHECK
01/17/18

PAY: FORTY SEVEN THOUSAND SIX HUNDRED SEVENTY THREE AND 09/100
DOLLARS

VOID IN 60 DAYS

CHECK AMOUNT
\$47,673.09

TO THE ORDER OF Harris County MUD 215
PO Box 1689
Spring TX 77383

Silicon Valley Bank
Pittsburgh, PA


Authorized Signature

⑈0000928676⑈

