



Control Number: 48454



Item Number: 34

Addendum StartPage: 0

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

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RECEIVED
2019 OCT 10 11:07
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,

A handwritten signature in black ink, appearing to read 'JP', is written over a horizontal line. Below the line, the name 'Jeffrey Peterson' is printed in a standard black font.

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

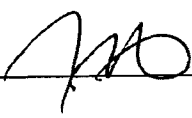
1278
Date: 05/19/2015

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 77366





ENCLOSE HERE:

1	2	3	4	5	6	7	8	9	10
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Microprint	Small, repeating characters used for security, visible along the top and bottom edges of the document.
Color Shifting Ink	Changes color when viewed from different angles, providing an additional layer of security.
Security Thread	A continuous thread woven into the paper, visible as a wavy line when held up to light.
Security Features	Includes a variety of other security features designed to prevent counterfeiting and ensure the integrity of the document.

The Trails at Dominion Park
8 Penn Center, 1828 JFK Blvd., Suite 1600
Philadelphia PA 19103

PAYMENT REFERENCE

0000-0677:123456785011DP0000046

CHECK NO.

0000279041

DATE OF CHECK

09/02/15

Void In 60 Days

PAY: THIRTY SIX THOUSAND SEVEN HUNDRED SEVENTEEN AND 06/100
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


Authorized Signature

0000279041

20150911008589134221309

995878341

PAY TO THE ORDER OF
COMPASS BANK
HOUSTON, TX 77002-6336
113010547
FOR DEPOSIT ONLY
HARRIS COUNTY MUD 215
LOCKBOX CLEARING ACCOUNT
6720379773

20150911008589134221309

THIS CHECK HAS A SECURITY PATTERN, MICR LINE AND CONTAINS OTHER SECURITY FEATURES. SEE BACK FOR DETAILS.

AB-GO Trails at Dominion Park LLC

1628 JVL Blvd
Suite 1000
Philadelphia, PA 19103
267-322-5800

Signature Bank
120 Avenue
12th Floor
New York, NY 10017

1654
Date: 10/20/2015

Pay To
The Order of Harris County MUD 215

Forty Three Thousand Ten Dollars and 98 Cents

\$**43,010.98**

Harris County MUD 215
5145 Spring Hill Drive
Spring, TX 77286

[Signature]



⑈001654⑈

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Document

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True Watermark	Watermark appears when held up to light
Phosphor Fluorescence	Fluoresces under UV light
Chemical Reactions	Changes color when exposed to chemicals
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Security Mark	Security mark on the back of the document

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 77002-6398
113010647
FOR DEPOSIT ONLY
HARRIS COUNTY MUD 215
LOCKBOX CLEARING ACCOUNT
678378773

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

PAYMENT REFERENCE

0000-0677:0000501100748

CHECK NO.

0000511836

00-180
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 1688
Spring TX 77383

Silicon Valley Bank
Pittsburgh, PA


Authorized Signature

⑈0000511836⑈

PAY TO THE ORDER OF
COMPASS BANK
HOUSTON, TX 77002-8938
113010547
FOR DEPOSIT ONLY
HARRIS COUNTY MUD 216
LOCKBOX CLEARING ACCOUNT
8720378773

20160831008955353821309



20160831008955353821309
HARRIS COUNTY MUD 216
LOCKBOX CLEARING ACCOUNT
8720378773

20160831008955353821309

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

PAYMENT REFERENCE

0000-0677:000050110090

CHECK NO.

0000614442

60-180
433

DATE OF CHECK

12/21/16

Void in 60 Days

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

CHECKAMOUNT

\$44,534.02

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

Silicon Valley Bank
Pittsburgh, PA


Authorized Signature

0000614442



THE UNIVERSITY OF THE DISTRICT OF
COLUMBIA
OFFICE OF THE CHIEF OF POLICE
1000 15TH STREET, N.W.
WASHINGTON, D.C. 20004

1000 15TH STREET, N.W. WASHINGTON, D.C. 20004

-20161227 20104-

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

PAYMENT REFERENCE

0000-0677:0000501101191

CHECK NO.
707937

DATE OF CHECK

04/25/17

VOID IN 60 DAYS

CHECK AMOUNT

\$44,111.86

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

TO THE ORDER OF

Harris County MUD 215
PO Box 1689
Spring TX 77383

Silicon Valley Bank
Pittsburgh, PA


Authorized Signature

0000707937



U.S. DEPARTMENT OF JUSTICE
FEDERAL BUREAU OF INVESTIGATION
WASHINGTON, D.C. 20535
TELEPHONE (202) 512-2400
FAX (202) 512-2401

U.S. DEPARTMENT OF JUSTICE

20170428 8 0010

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

PAYMENT REFERENCE

0000-0677:0000501101319

CHECK NO.
745013

60-160/4

DATE OF CHECK

06/14/17

VOID IN 60 DAYS

CHECK AMOUNT

\$61,084.02

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

TO THE ORDER OF

Harris County MUD 215
PO Box 1689
Spring TX 77383

Silicon Valley Bank
Pittsburgh, PA


Authorized Signature

⑈0000745013⑈



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

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

CHECK AMOUNT
\$53.74

Silicon Valley Bank
Pittsburgh, PA


Authorized Signature

⑈0000748484⑈



20170622 6 0153

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

PAYMENT REFERENCE

0000-0677:0000501101333

CHECK NO.
758139

DATE OF CHECK

06/30/17

VOID IN 60 DAYS

CHECK AMOUNT

\$41,091.58

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

TO THE ORDER OF

Harris County MUD 215
PO Box 1689
Spring TX 77383

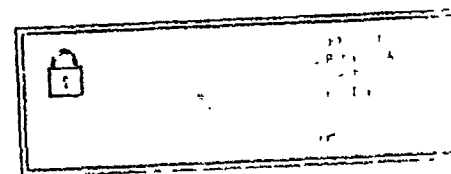
Silicon Valley Bank
Pittsburgh, PA


Authorized Signature

⑈0000758139⑈

PAY TO THE ORDER OF
COMPASS BANK
HOUSTON, TX 77002-6336
113010547
FOR DEPOSIT ONLY
HARRIS COUNTY MUD 215
LOCKBOX CLEARING ACCOUNT
6720379773

201705 26 0158



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

PAYMENT REFERENCE

0000-0677:0000501101438

CHECK NO.
797456

DATE OF CHECK

08/18/17

VOID IN 60 DAYS

CHECK AMOUNT

\$54,550.89

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

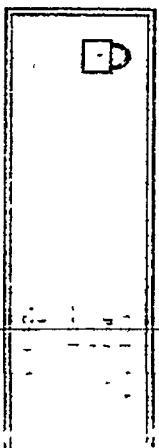
TO THE ORDER OF

Harris County MUD 215
PO Box 1689
Spring TX 77383

Silicon Valley Bank
Pittsburgh, PA


Authorized Signature

⑈0000797456⑈



20170822 3-0160

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

PAYMENT REFERENCE

0000-0677:0000501101513

CHECK NO.
826139

DATE OF CHECK

09/23/17

VOID IN 60 DAYS

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

CHECK AMOUNT

\$49,165.88

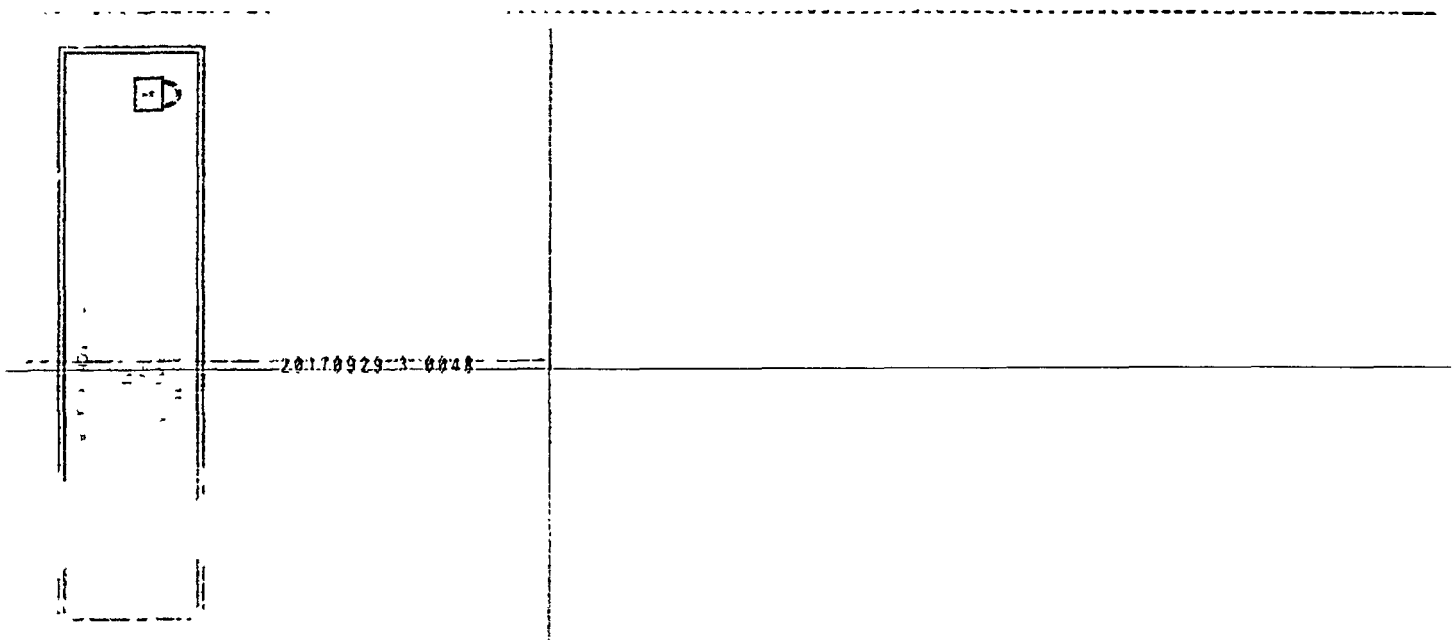
TO THE ORDER OF

Harris County MUD 215
PO Box 1689
Spring TX 77383

Silicon Valley Bank
Pittsburgh, PA


Authorized Signature

⑈0000826139⑈



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

PAYMENT REFERENCE
0000-0677:0000501101590

CHECK NO.
859474

60-160/4

DATE OF CHECK
10/31/17

PAY: TWELVE AND 50/100 DOLLARS

VOID IN 60 DAYS

CHECK AMOUNT
\$12.50

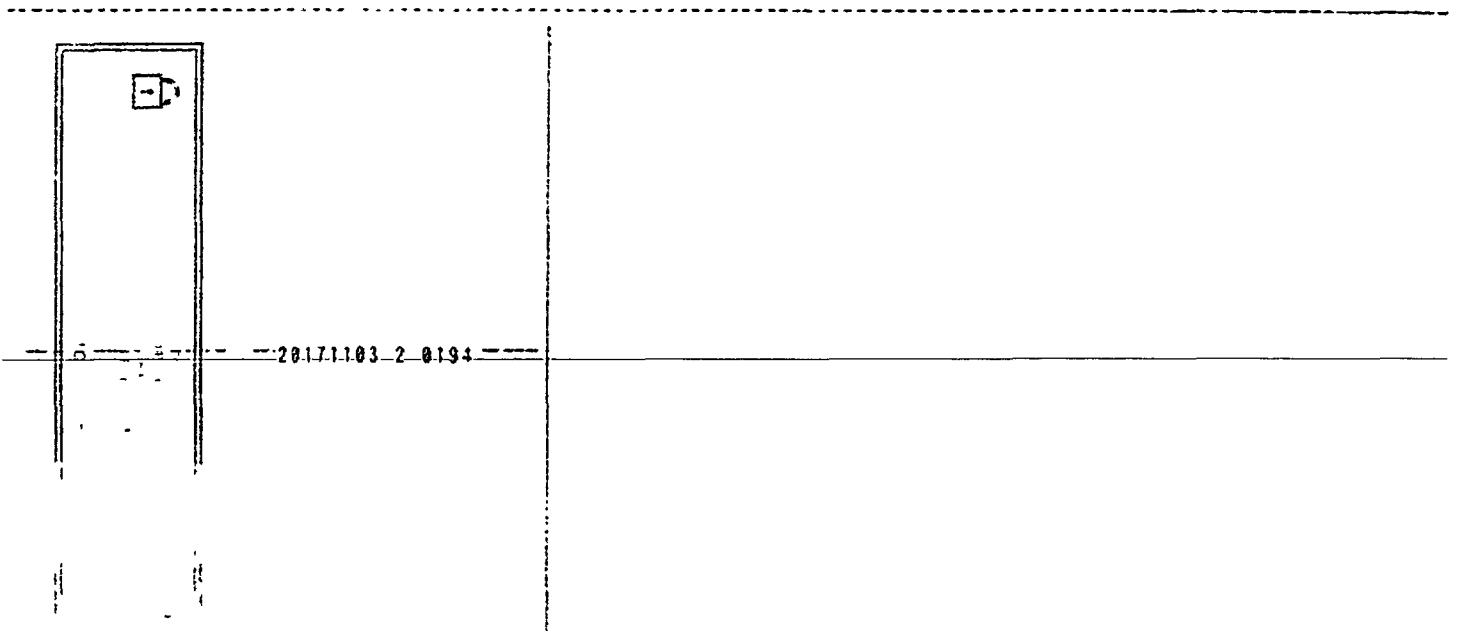
 SECURITY
CHECKS ARE SAFE

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

Silicon Valley Bank
Pittsburgh, PA


Authorized Signature

⑈0000859474⑈



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

CHECK NO.
879678

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 MUD 215
PO Box 1689
Spring TX 77383

Silicon Valley Bank
Pittsburgh, PA


Authorized Signature

⑈0000879678⑈

PAY TO THE ORDER OF
COMPASS BANK
HOUSTON TX 77002-8338
11.3010547
FOR DEPOSIT ONLY
HARRIS COUNTY MUD 216
LOCKBOX CLEARING ACCOUNT
6/20379773



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

PAYMENT REFERENCE
0000-0677:0000501101631

CHECK NO.
880220

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

Auth. Frisole
Authorized Signature

⑈0000880220⑈

**PAY TO THE ORDER OF
COMPASS BANK
HOUSTON, TX 77002-8336
113010547**

FOR DEPOSIT ONLY
HARRIS COUNTY MUD 215
PO BOX CLEARING ACCOUNT
6720379773

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

PAYMENT REFERENCE

0000-0677:0000501101707

CHECK NO.
928676

DATE OF CHECK

01/17/18

VOID IN 60 DAYS

CHECK AMOUNT

\$47,673.09

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

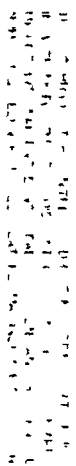
TO THE ORDER OF

Harris County MUD 215
PO Box 1689
Spring TX 77383

Silicon Valley Bank
Pittsburgh, PA


Authorized Signature

⑈0000928676⑈



E. J. O'Donnell
1712 4th N. Street E. Apt. A
Edmonton Alberta