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September 27, 2019

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PUBLIC UTILITY COMMISSION
FILING CLERK

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

48934

Re: Application for Approval to Waive Submeter Requirement and Permit Allocated Billing for (Eureka)

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 (Eureka), located at 509 Eureka St , Weatherford Tx 76086 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 is about to complete construction, the installation of submeters continues to remain cost-prohibitive as the Property is comprised of 16 units. This permits only 16 units to be billed for water-sewer utility costs. The cost to install submeters at this Property would be approximately \$3,264.00 based on the attached Proposal, and unfortunately such financial commitment is not feasible for the Property at this time, nor over a period of time due to the setup of the Property. In order to bill the 16 units for their full water/sewer consumption, our best option is to allocate based upon the 50/50 square footage and occupancy count methodology. This will also seek to support our mission of providing affordable housing to our community. As such, we are seeking Commission approval to allocate water/sewer charges in this manner.

Should the Commission approve an allocation method of billing 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

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the Commission's time and effort in looking into this matter and look forward to receipt of a response.

Respectfully submitted,

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