



Control Number: 49370



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DOCKET NO. 49370

COMPLAINT OF CASSANDRA DENIS
HARRIS AGAINST THE LANDINGS
AT WILLOWBROOK AND REALPAGE
UTILITY MANAGEMENT

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PUBLIC UTILITY COMMISSION

RECEIVED
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PUBLIC UTILITY COMMISSION
OF TEXAS
FILING CLERK

Respondent RealPage Utility Management

COME NOW RealPage Utility Management, Inc. and The Landings at Willowbrook ("Respondents") and file this, their Answers to Commission Staff's Second Request for Information ("RFI") on file herein and for such answer would show the Commission the following:

Answers to Commission Staff's RFI Questions Staff 2-1 Through 2-2

Staff 2-1: Provide a copy of the bill for service from November 19, 2018 to December 17, 2018.

Response 2-1:

Attached as exhibit 2-1 is the City of Houston invoice dated 12/19/2018 covering the service period of November 19, 2018 to December 17, 2018.

Staff 2-2: Provide the total number of occupants in all dwelling units at the beginning of each month from October 2018 to March 2019.

Response 2-2:

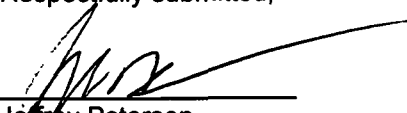
As previously provided, below list includes the billing periods as well as occupancy information. We have added a column in the chart listing the requested total number of occupants on the first day of the billing period. It should be noted that Ms. Harris has 2 occupants registered in the apartment.

Resident Billing Period	Billing Days	Total Property Occupancy Value Days	Ms. Harris' Occupancy Value Days	Total Occupancy at Beginning of period
9/19/18 – 10/23/18	35	11,982	26 (10/11/18 – 10/23/18)	345
10/24/18 – 11/23/18	31	10,513	62 (10/24/18 – 11/23/18)	338
12/18/18 – 1/17/19	31	11,539	62 (12/18/18 – 1/17/19)	371
1/18/19 – 2/18/19	32	10,624	64 (1/18/19 – 2/18/19)	335
2/19/19 – 3/19/19	29	9,675	58 (2/19/19 – 3/19/19)	332
3/20/19 – 4/18/19	30	10,389	60 (3/20/19 – 4/18/19)	337
4/19/19 – 5/29/19	41	15,088	82 (4/19/19 – 5/29/19)	362

Prayer for Relief

WHEREFORE, PREMISES CONSIDERED, Respondents respectfully request that the Commission issue an order dismissing this Complaint, following a review of this response and all billing records provided.

Respectfully submitted,



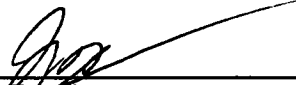
Jeffrey Peterson

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

**Representative for
RealPage Utility Management, Inc., and
The Landings at Willowbrook**

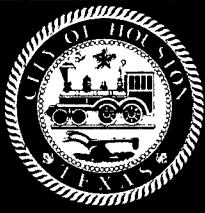
CERTIFICATE OF SERVICE

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 December 5th, 2019 in the following manner: fax, hand-delivery, first class mail and/or Overnight delivery.



Jeffrey Peterson

Exhibit 2 – 1



City of Houston Delinquent Utility Bill

www.houstonwater.org

Service Interruption Notice

Scheduled on or after 1/9/2019

Customer Name: BRIDGE NATIONAL PARTNERS II LP
Account Number: 4327-1720-1037
Service Address: 7250 W GREENS RD
Bill Date: 12/19/2018
Total Amount Due: \$37,100.80

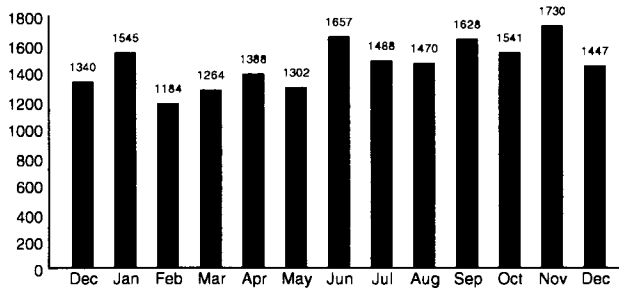
Billing Period

Previous Read Date 11/19/2018
Current Read Date 12/17/2018
Previous Meter Reading 43037
Current Meter Reading 44484

Summary of Charges

Previous Balance \$19,091.48
Payment \$0.00
Adjustments \$0.00
Past Due Amount (due immediately) \$19,091.48
Current Charges \$18,009.32
Total Amount Due \$37,100.80

Water Meter Consumption (per 1,000 gal.)



Avoid late fees by paying the Total Amount Due by 1/9/2019

* If you have a question about your bill or want to make a payment: 713-371-1400

Account Subject to Service Interruption

See the back of the bill for payment options

Account Number: 4327-1720-1037

Return this portion with payment. Write account number on all checks.
Payable to: CITY OF HOUSTON

TOTAL AMOUNT DUE:	\$37,100.80
Amount Paid:	
Due Date:	1/9/2019
Amount After 1/9/2019	\$40,810.88

\$1 Gift to W.A.T.E.R. Fund

HOU121938004049

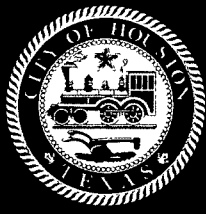


BRIDGE NATIONAL PARTNERS II LP
7250 W GREENS RD
HOUSTON TX 77064-1133



CITY OF HOUSTON
PO BOX 1560
HOUSTON TX 77251-1560

432717201037 0003710080 0004081088



City of Houston

Delinquent Utility Bill

www.houstonwater.org

Detailed Meter Usage

Meter Type	Meter Number	Meter Size (Inches)	Previous Reading	Current Reading	Gallons in Thousands	Read Date
WATER MULTIF	70064223-TR-4.000	4	43037	44484	1447	12/17/2018

Payments Received	Adjustments	Current Charges
		Multifamily Base Sewer Charge \$25.35
		Multifamily Consumption Sewer Charge \$9,058.22
		Multifamily Consumption Water Charge \$6,236.57
		Drainage Charge \$735.41
		Multifamily Base Water Charge \$44.62
		Utility Penalty \$1,835.61
		Drainage Penalty \$73.54

If you feel that you have been incorrectly billed for water or sewer services, you have the right to dispute the charges. You must file within 90 days from the date of the first disputed bill to request an administrative review or hearing. Please visit our website at www.houstonwater.org for a complete list of non-disputable items. If you are waiting for a decision on a bill adjustment, you must continue to pay your current bill(s) while awaiting resolution of your adjustment to avoid interruption of your service, additional penalties, and/or late fees. **In the event service is disconnected for non-payment, service may not be reinstated for one to two business days after the account has been paid in full or satisfactory arrangements have been made.**

If your services are in danger of termination because you cannot pay, you may be eligible for assistance from the W.A.T.E.R. Fund. Proof of income is required and assistance is subject to availability of funds.

Your drainage charge is calculated on the impervious surface area of your property less a 1,000 square foot adjustment.

Service Interruption Notice - Questions on how to pay?

- Pay online at www.houstonwater.org or by phone at 713-371-1400.
- Payments made **within 24 hours** of the interruption date, **must pay by check** using the City of Houston's web site. Any other payment method is subject to additional fees.
- Use Automated payment system by calling 713-371-1265.
- Service reconnection may take up to **2 Business Days** after proof of payment has been provided.
- To expedite service reconnection, payments must be made and reported before noon.
- Email receipts to COH.Collect@houstontx.gov or fax to 713-371-1180.
- If you cannot pay your bill, payment agreements, payment assistance and financial coaching are available.