



Control Number: 50431



Item Number: 200

Addendum StartPage: 0



# 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: 5431  
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 Adam Neville Starr

2020 MAR -2 AM 9:58

Mailing Address: PO BOX 2899

City Georgetown

State TX

Zip 78627

Telephone# (AC) 512-818-0040

Fax # (if applicable)

E-mail adamstarr12@gmail.com

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

Name Westwood Townhomes

Mailing Address: 200 River Bend Dr

City Georgetown

State TX

Zip 78628

Telephone# (AC) 512-868-2101

Fax # (if applicable)

E-mail Office@Westwood-townhomes.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 Georgetown

Date submetered or allocated billing begins (or began) 9/18/2019

Required

## 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 with a total of (3) copies 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 checked="" type="checkbox"/> <b>Occupancy method:</b> 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.
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<input type="checkbox"/> <b>Ratio occupancy method:</b>  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.	<b>Number of Occupants</b>	<b>Number of Occupants for Billing Purposes</b>
	1	1.0
	2	1.6
	3	2.2
	>3	2.2 + 0.4 for each additional occupant

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

<input checked="" type="checkbox"/> <b>Occupancy and size of rental unit</b>	<input type="text" value="50"/>	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:
<ul style="list-style-type: none"><li>• the size of the tenant's dwelling unit divided by the total size of all dwelling units, OR</li><li>• the size of the space rented by the tenant of a manufactured home divided by the size of all rental spaces.</li></ul>		

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

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



Westwood Townhomes  
200 River Bend Drive, Georgetown, TX 78628

% Adam Starr  
PO Box 2899, Georgetown, TX 78627  
[adamstarr12@gmail.com](mailto:adamstarr12@gmail.com)  
512-818-0040

Dear Cliff Crouch,

We, Westwood Townhomes of Georgetown, Texas, are seeking to change our method of water/wastewater suballocation that is currently in place at the Public Utilities Commission. Currently at the PUC, Westwood Townhomes' suballocation method is submetering via a hotwater heater meter and we would like to change it to suballocation based on a PUC approved formula using occupancy. This request is made because Westwood Townhomes was already using occupancy based allocation on the date that I purchased the property - September 18th, 2019. It appears it has been this way for many years.

For me to reinstate the submetering from a waterheater meter it seems would require checking existing meters for accuracy, installing meters where the previous meters were removed, and replacing meters that are not working properly. Unfortunately, I was not able to find a plumbing company willing to give a bid on testing the existing meters, but from our 110 units, I have seen that at least 30 of these units have had the meter removed and many of the others do not appear in promising condition. The brand of the meters is: Raab Karcher instameter. The best quote I received is from Britain Plumbing and their after-tax price for installing an auto-read water meter is \$705.60.

With the 30 meters that have been removed (before I bought the property) and an assumption to replace 1/3 of the existing meters in place, I come up with the following price for reinstating the submetering using a waterheater meter:

Task	Price
Install 30 meters	$\$705.60 \times 30 = \$21,168$
Replace 26 meters (estimate)	$\$705.60 \times 26 = \$18,345.60$
<b>Total</b> (does not include testing meters for accuracy)	<b>\$39,513.60</b>

We, nor the previous owner, have ever had any complaints regarding the waterbills that residents receive; in fact, the only comments that have been made from our residents is that our waterbills seem low relative to other properties that they have resided at. Also, all of our residents' leases actually indicate we allocate our water bill based on an occupancy based formula, so it might actually become very cumbersome with residents' to change to a meter based allocation method.

It is our sincere apologies that the allocation method was changed at some time in the past without your approval. I am willing to do whatever you think is best to rectify this situation.

Thank you very much for your help. Please find our meter replacement quote and our current resident lease allocation method notification attached, and please contact me with any questions or concerns.

Regards,

Westwood Townhomes  
Adam Starr  
[adamstarr12@gmail.com](mailto:adamstarr12@gmail.com)  
512-818-0040

Brittain Plumbing, Inc.

104 Country Road  
Georgetown, Texas 78628

## Estimate / Work Order

Date	Estimate #
2/20/2020	1731

Customer Phone

Rep
SB

Name / Address
Westwood Townhomes 200 River Bend Dr. Georgetown, Texas 78628

Qty	Item	Cost	Description	Total
	MATERIAL	305.40	TOTAL MATERIAL USED	305.40T
	LABOR	375.00	TOTAL LABOR	375.00
			Bid to replace water meters auto read. This price is per each meter per each unit	

	<b>Subtotal</b>	\$680.40
This estimate is for completing the job as described above. It is based on our evaluation and does not include material price increases or additional labor and materials which may be required should unforeseen problems, adverse weather conditions, or rock work arise after the work has started.M14842.Tx State Board of Plumbing Examiners, PO Box 4200, Austin, Tx,78765.Phone	<b>Sales Tax (8.25%)</b>	\$25.20
	<b>Total</b>	\$705.60

Phone #	Fax #
(512)869-1331	(512)869-8134