

Control Number: 50431



Item Number: 739

Addendum StartPage: 0

CONSERVICE The Utility Experts

2020 JUN 24 PM 12: 43
PUZLING SLEAK 5 0 4 3 1

Public Utility Commission Central Records Attn: Cliff Crouch, Manager – Licensing and Compliance 1701 N. Congress Avenue, P.O Box 13326 Austin, TX 78711-3326

RE: Request for Approval to Change Billing Method at Broadstone New Territory I/II S0687.

Dear Mr. Crouch:

Our company, Conservice LLC, serves as the utility billing provider for Broadstone New Territory, upon whose behalf and authorization we send this letter. The purpose of this correspondence is to formally request that the Public Utility Commission of Texas ("PUC") approve this property to transition from its registered status as submetered to allocated billing.

We understand that Texas Water Code section § 13.502 permits the owner to switch from submetered to allocated billing upon a showing of good cause and approval by the PUC. Broadstone New Territory is currently registered with TPUC as submetered, however Broadstone New Territory has no record of ever being submetered. We believe that the previous registration may have been a clerical error. Because Broadstone New Territory would have to commission an entirely new submetering system which would incur a significant cost and the property does not anticipate having the capital resources required to make these and future repairs, they respectfully request that they be allowed to bill tenants through allocative methods.

Should you require any additional information in making your determination please do not hesitate to contact me directly.

Sincerely,

Bret R. James Legal Counsel – Conservice 750 South Gateway Drive River Heights, UT 84321 435-750-5402 bretjames@conservice.com



Austin, Texas 78711-3326

Registration of Submetered OR Allocated

S0687

NOTE: Please DO NOT include any person or protected information on

Date: 01/16/2020
By: Legal
Docket No
(this number to be assigned by the
PUC after your form is filed)

this form (ex: tax identification # s, social security # s, etc.)							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 Broadstone I/II, LP									
Mailing Address:	1525 Loc	cust St, Su	ite 1301	City	Philadelphia		State PA	Zip	19102
Telephone# (AC)	(281) 340	0-5555		Fax	# (if applicable)				
E-mail	whernan	dez@allre	sco.com						
NAI	ME, ADDI	RESS, AND	TYPE OF 1	PROPE	RTY WHERE U	TILITY	SERVICE IS P	ROVID	ED
Name Broadstor									
		v Territory B	lvd		Sugar Land		State TX	Zip	77479
Telephone# (AC)	(281) 34	0-5555		Fax	# (if applicable)				
		conservice							
X Apartment Com		Condomir			factured Home	Rental C	Community	Mult	iple-Use Facility
If applicable, descri	be the "m	ultiple-use							
				TION (ON UTILITY SE	RVICE		•	
Tenants are billed f	or X	Water X				Sub	metered <u>OR</u>	X A	llocated ★★★
Name of utility pro					ar Land TX				
Date submetered or							Required		
METHOD USED TO					· · · · · · · · · · · · · · · · · · ·				
Not applicable, because Bills are based on the tenant's actual submetered consumption									
There are <u>neither</u> common areas <u>nor</u> an installed irrigation system									
All common areas and the irrigation system(s) are metered or submetered:									
We deduct the actu	ıal utility	charges for	water and v	wastewa	iter to these are	as then a	allocate the rer	maining	charges among
our tenants.									
This property has an installed irrigation system that is <u>not</u> 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.									
X This property has an installed irrigation system(s) that <u>is/are</u> 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 <u>not</u> 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.									
$\star\star\star$ IF UTILITY SERVICES ARE ALLOCATED, YOU MUST ALSO COMPLETE PAGE TWO OF THIS FORM $\star\star\star$									
Send this form by n		, ,	•						
Filing Clerk, Public	•		of Texas						
1701 North Congress Avenue									
F (DAY 111/2									

METHOD USED TO ALLOCATE UTILITY CHARGES

Check the box or boxes that describe the allocation method used to bill tenants.							
Occupancy method: 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 m	onth for which bills are b	eing rendered.					
X Ratio occupancy method:		Number of Occupants for					
	Number of Occupants	Billing Purposes					
The number of occupants in the tenant's dwelling unit	1	1.0					
is adjusted as shown in the table to the right. This	2	1.6					
adjusted value is divided by the total of these values	3	2.2					
for all dwelling units occupied at the beginning of the	>3	2.2 + 0.4 for each additional occupant					
retail public utility's billing period.							
Estimated occupancy method:	Number of	Number of Occupants for					
	Bedrooms	Billing Purposes					
The estimated occupancy for each unit is based on the	0 (Efficiency)	1					
number of bedrooms as shown in the table to the	1	1.6					
right. The estimated occupancy in the tenant's	2	2.8					
dwelling unit is divided by the total estimated	3	4.0					
occupancy in all dwelling units regardless of the actual	>3	4.0 + 1.2 for each additional bedroom					
number of occupants or occupied units.							
Occupancy and size of rental unit 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: • the size of the tenant's dwelling unit divided by the total size of all dwelling units, OR • the size of the space rented by the tenant of a manufactured home divided by the size of all rental spaces. Submetered hot water:							
The individually submetered hot water used in the tenant's dwelling unit is divided by all submetered hot water used in all dwelling units.							
Submetered cold water is used to allocate charges for hot water provided through a central system:							
The individually submetered cold water used in the tenant's dwelling unit is divided by all submetered cold water used in all dwelling units.							
As outlined in the condominium contract. Describe:							
Size of manufactured home rental space:							
The size of the area rented by the tenant divided by the	total area of all the size o	f rental spaces.					
Size of the rented space in a multi-use facility:							

The square footage of the space rented by the tenant divided by the total square footage of all rental spaces.



Registration of Submetered OR Allocated

S0687

NOTE: Please **DO NOT** include any person or protected information on

Date: 01/16/2020 By: Legal Docket No._

this form (ex	x: tax identification #'s, social se	1 '	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 Broadstone I/II, LP		viier b contract manager, in	unagement company,	or oming company.		
Mailing Address: 1525 I	Locust St, Suite 1301	City Philadelphia	State PA	Zip 19102		
Telephone# (AC) (281)		Fax # (if applicable)				
E-mail whern	nandez@allresco.com					
NAME, AI	DDRESS, AND TYPE OF PR	OPERTY WHERE UTI	LITY SERVICE IS PR	OVIDED		
Name Broadstone New	w Territory I/II					
Mailing Address: 5555	New Territory Blvd	City Sugar Land	State TX	Zip 77479		
Telephone# (AC) (281)	340-5555	Fax # (if applicable)				
E-mail c/o leg	gal@conservice.com					
X Apartment Complex	Condominium N	Manufactured Home Rei	ntal Community	Multiple-Use Facility		
If applicable, describe the	"multiple-use facility" here:					
	INFORMAT	ION ON UTILITY SERV	/ICE			
Tenants are billed for	Water X Wastewater	r	Submetered OR	X Allocated ★★★		
Name of utility providing	water/wastewater City of	f Sugar Land TX				
Date submetered or alloca	ated billing begins (or began)	01/01/2020	Required			
	SET CHARGES FOR COMM		ne line only.			
Not applicable, because	e Bills are based on th	ne tenant's actual subme	tered consumption			
There are <u>neither</u> common areas <u>nor</u> 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 <u>not</u> 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.						
X This property has an installed irrigation system(s) that <u>is/are</u> 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 <u>not</u> 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.						
$\star\star\star$ IF UTILITY SERVICES ARE ALLOCATED, YOU MUST ALSO COMPLETE PAGE TWO OF THIS FORM $\star\star\star$						
Send this form by mail with a total of (3) copies to:						
Filing Clerk, Public Utility Commission of Texas						
1701 North Congress Ave						
P.O. Box 13326						
Austin, Texas 78711-3326)					

METHOD USED TO ALLOCATE UTILITY CHARGES

Check the box or boxes that describe the allo							
Occupancy method: The number of occupants in th	_	· · · · · · · · · · · · · · · · · · ·					
occupants in all dwelling units at the beginning of the m	nonth for which bills are b	eing rendered.					
X Ratio occupancy method:	,	Number of Occupants for					
	Number of Occupants	Billing Purposes					
The number of occupants in the tenant's dwelling unit	1	1.0					
is adjusted as shown in the table to the right. This	2	1.6					
adjusted value is divided by the total of these values	3	2.2					
for all dwelling units occupied at the beginning of the	>3	2.2 + 0.4 for each additional occupant					
retail public utility's billing period.	-						
Estimated occupancy method:	Number of	Number of Occupants for					
- '	Bedrooms	Billing Purposes					
The estimated occupancy for each unit is based on the	0 (Efficiency)	1					
number of bedrooms as shown in the table to the	1	1.6					
right. The estimated occupancy in the tenant's	2	2.8					
dwelling unit is divided by the total estimated	3	4.0					
occupancy in all dwelling units regardless of the actual	>3	4.0 + 1.2 for each additional bedroom					
number of occupants or occupied units.		T.0 1 1.2 101 Cach additional bearbonn					
Occupancy and size of rental unit percent	nt (in which no more than	50%) of the utility bill for					
water/wastewater consumption is allocated using the occ	•	•					
according to either:							
• the size of the tenant's dwelling unit divided by the to	tal size of all dwelling uni	ts. OR					
• the size of the space rented by the tenant of a manufactured home divided by the size of all rental spaces.							
the size of the space rented by the tenant of a manufactured nome divided by the size of an rental spaces.							
Submetered hot water:							
The individually submetered hot water used in the tena	ent's devolling unit is divid	ad by all submatared hat water used in					
all dwelling units.	int's awening unit is divide	ed by all submetered not water used in					
an dwelling units.							
	1 1.1.1						
Submetered cold water is used to allocate charges for hot water provided through a central system:							
The individually submetered cold water used in the ten	ant's dwelling unit is divid	ded by all submetered cold water used in					
all dwelling units.							
As outlined in the condominium contract. Describe)* ••						
Size of manufactured home rental space:							
The size of the area rented by the tenant divided by the total area of all the size of rental spaces.							
Size of the rented space in a multi-use facility:							
The square footage of the space rented by the tenant divided by the total square footage of all rental spaces							



Registration of Submetered OR Allocated

Utility Service

S0687

Date: 01/16/2020

By: Legal

Docket No.____

(this number to be assigned by the

(*) 24 /*/			ушцу 3	ACT AT	ice	l	DOCKET NO	
NOTE: Please DO NOT include any person or protected information on this form (ex: tax identification #'s, social security #'s, etc.)				on	(this number to be assigned by the			
					PUC after your form is filed)			
PROPERTY OW	PROPERTY OWNER: Do not enter the name of the owner's contract manager, management company, or billing company.							
Name Broadstone	I/II, LP							
Mailing Address:	1525 Loc	cust St,	Suite 130)1	City Philadelphia		State PA	Zip 19102
Telephone# (AC)	(281) 34	0-5555			Fax # (if applicable)		-	
E-mail	whernan	dez@a	Ilresco.co	m				
NA	ME, ADD	RESS, A	ND TYPE (OF PR	OPERTY WHERE UT	ILITY	SERVICE IS P	PROVIDED
Name Broadsto								
Mailing Address:	5555 Nev	v Territoi	y Blvd		City Sugar Land	-	State TX	Zip 77479
Telephone# (AC)	(281) 34	0-5555	5		Fax # (if applicable)			
E-mail	c/o legal@	conser	vice.com					
X Apartment Con			minium		Manufactured Home Re	ental C	Community	Multiple-Use Facility
If applicable, descr	ibe the "m	ultiple-	use facility'	here:				
			INFOR	MAT	ION ON UTILITY SER	VICE		
Tenants are billed	for X	Water	X Waste	water	r	Sub	metered <u>OR</u>	X Allocated ★★★
Name of utility pro					f Sugar Land TX			
Date submetered o							Required	
METHOD USED T	O OFFSE	Γ CHAR	GES FOR C	COM	MON AREAS Check of	one lin	ne only.	
Not applicable,	Not applicable, because Bills are based on the tenant's actual submetered consumption							
There are <u>neither</u> common areas <u>nor</u> an installed irrigation system								
		_	•	•	metered or submetered			
We deduct the act	ual utility	charges	for water a	nd wa	stewater to these areas	then a	allocate the re	maining charges among
our tenants.								
			•		at is <u>not</u> separately met			
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.								
X This property has an installed irrigation system(s) that <u>is/are</u> 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 <u>not</u> 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.								
A A A VIDAMINA DIRECTOR A DIR ANNO CAMBID AVOLUNTARIO CON CONTRA DA CONTRA DE CONTRA D								
★★★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 Congre	ess Avenu	:						
P.O. Box 13326	Austin, Texas 78711-3326							
Austin, Texas 70/1	1-0040							

METHOD USED TO ALLOCATE UTILITY CHARGES

Check the box or boxes that describe the allo	ocation method used to bil	ll tenants.					
Occupancy method: 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 m	onth for which bills are b	eing rendered.					
X Ratio occupancy method:		Number of Occupants for					
	Number of Occupants	Billing Purposes					
The number of occupants in the tenant's dwelling unit	1	1.0					
is adjusted as shown in the table to the right. This	2	1.6					
adjusted value is divided by the total of these values	3	2.2					
for all dwelling units occupied at the beginning of the	>3	2.2 + 0.4 for each additional occupant					
retail public utility's billing period.		2.2 · 0.1 for each additional occupant					
		······································					
Estimated occupancy method:	Number of	Number of Occupants for					
• /	Bedrooms	Billing Purposes					
The estimated occupancy for each unit is based on the	0 (Efficiency)	1					
number of bedrooms as shown in the table to the	1	1.6					
right. The estimated occupancy in the tenant's	2	2.8					
dwelling unit is divided by the total estimated	3	4.0					
occupancy in all dwelling units regardless of the actual	>3	4.0 + 1.2 for each additional bedroom					
number of occupants or occupied units.		1.0 1.2 for each additional bedroom					
Occupancy and size of rental unit 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:							
• the size of the tenant's dwelling unit divided by the total size of all dwelling units, OR							
• the size of the space rented by the tenant of a manufactured home divided by the size of all rental spaces.							
Submetered hot water:							
The individually submetered hot water used in the tena	nt's dwelling unit is divid	ed by all submetered hot water used in					
all dwelling units.							
Submetered cold water is used to allocate charges for hot water provided through a central system:							
The individually submetered cold water used in the tenant's dwelling unit is divided by all submetered cold water used in							
all dwelling units.							
As outlined in the condominium contract. Describe:							
Size of manufactured home rental space:							
The size of the area rented by the tenant divided by the total area of all the size of rental spaces.							
Size of the rented space in a multi-use facility:							
The square footage of the space rented by the tenant divided by the total square footage of all rental spaces.							