



Control Number: 51856



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Bryan W. Shaw, Ph.D., Chairman
Buddy Garcia, Commissioner
Carlos Rubinstein, Commissioner
Mark R. Vickery, P.G., Executive Director



SAP 5433 COE

TEXAS COMMISSION ON ENVIRONMENTAL QUALITY

Protecting Texas by Reducing and Preventing Pollution

March 22, 2012



Mr. Patrick Bruce
GraPat Group, Inc
PO BOX 831757
RICHARDSON TX 75083-1757

Re: Request for Approval to Change Billing Method for the following:
MISSION OAKS, Registration No.S5433:CN603248188 RN105347652
VISTAS OF VANCE JACKSON, Registration No.S5404:CN601721178
RN105247662
VISTAS AT LAKE WORTH, Registration No.S1728:CN600701858
RN101272904

Dear Mr. Bruce:

The requests you have submitted on behalf of **MISSION OAKS, VISTAS OF VANCE JACKSON, and VISTAS AT LAKE WORTH** apartments to change from submetered to allocated billing are approved. These approvals are based on the facts stated in your letters of December 21, 2011. Please complete the TCEQ-10363 and TCEQ-10400 forms enclosed and return with a copy of this letter.

If you have any questions, please contact Debbie Reyes Tamayo at 512/239-4683. Via e-mail to debbie.reyes-tamayo@tceq.texas.gov.

Sincerely,

Tammy Benter, Manager
Utilities & Districts Section
Water Supply Division

TB/DRT/mmg

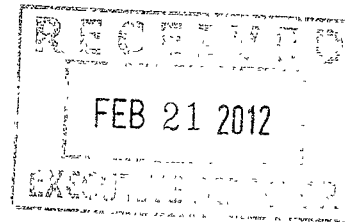
Enclosures (TCEQ-10363 and TCEQ-10400)



Real Estate Management Division

December 21, 2011

Mr. Glen Shankle
Texas Commission on Environmental Quality
Water Supply Division
MC-109
P.O. Box 13087
Austin, TX 78711-3087



Re: Mission Oaks – Change to Allocated Billing

Dear Mr. Shankle:

This letter was prepared in anticipation of obtaining your approval for a change from submetered billing to an approved allocation billing method in accordance with 30 TAC §291.123(d).

The Mission Oaks apartment community, which is located at 7575 Callaghan, San Antonio TX, 78229 is comprised of 228 dwelling units that have individual water submeters installed. Regrettably, the submetering system is in need of on-going repairs and has proved much too costly to maintain and repair on a regular basis and, unfortunately, it is not economically feasible for us at this time.

Therefore, we respectfully request your approval of a change from submetered billing to an approved allocation method due to the considerable capital that would be involved in replacing the un-serviceable submetering system. We will adhere to the additional Texas Commission on Environmental Quality (“TCEQ”) requirements if our request is approved, which includes the following under 30 TAC §291.123(c):

1. We shall provide to all tenants a new lease addendum or other written agreement which provides for the allocation method. in this case a method based on occupancy
2. We shall provide to all tenants a 35-day prior written notice advising tenants of the proposed change.

We trust the information we have provided to the TCEQ is sufficient in detail as to warrant approval of a change to an approved allocation method of billing. However, in the event you require additional information, please feel free to contact me.

Respectfully,

Patrick Bruce
GraPat Group, Inc

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WATER SUPPLY DIV.
TCEQ
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