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



DR
SAP 5404 CO

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,

A handwritten signature in cursive script that reads "Tammy Benter".

Tammy Benter, Manager
Utilities & Districts Section
Water Supply Division

TB/DRT/mmg

Enclosures (TCEQ-10363 and TCEQ-10400)



Real Estate Management Division

55404

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: Vistas of Vance Jackson – 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 Vistas of Vance Jackson apartment community, which is located at 12436 Vance Jackson, San Antonio TX 78230 is comprised of 240 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,

A handwritten signature in black ink, appearing to read 'Patrick Bruce', written over a horizontal line.

Patrick Bruce
GraPat Group, Inc