



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*



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2009 JUL 20 PM 12:28

TEXAS COMMISSION ON ENVIRONMENTAL QUALITY

COMMISSION

Protecting Texas by Reducing and Preventing Pollution

November 19, 2009

Ms. Michaela Smith
Regional Vice President
Trinity Property Consultants
1700 Pacific Avenue, Suite 2430
Dallas, Texas 75201

Re: Request for approval to change billing method
South Shore Lakes, Registration No. S1232
CN: 600644223 RN: 101199065

Dear Ms. Smith:

The request you submitted on behalf of South Shore Lakes to change from submetered to allocated billing is approved. This approval is based on the facts stated in your letter of November 5, 2009. Please complete the attached forms and return them along with a copy of this letter. You may do so via facsimile at: 512-239-6190.

If you have any questions, please contact me at 512-239-6403, via e-mail at mtaunton@tceq.state.tx.us, or by fax at 512-239-6190.

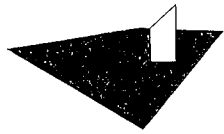
Sincerely,

A handwritten signature in cursive script that reads "Margot Taunton".

Margot Taunton, Program Specialist
Utilities & Districts Section
Water Supply Division

MT/ln

Attachments (TCEQ-10363 and TCEQ-10400)



trinity
Property Consultants

1700 Pacific Avenue, Suite 2430
Dallas, TX 75201
P 214 965-9523
F 214 965-9544

S 1232
CN 600644223
RN 101199065

November 5, 2009

Margot Taunton
Texas Commission on Environmental Quality
Water Supply Division, MC-153
P.O. Box 13087
Austin, TX 78711-3087

RE: Conversion from Submetering to Allocation at South Shore Lakes

Dear Margot Taunton:

The submetering system at South Shore Lakes is an old submetering system in which is in need of replacement. Employees and contractors of South Shore Lakes have made diligent efforts to repair the meters without success.

The property has explored the feasibility of replacing the submetering system, but the cost would be prohibitive. Attached is a proposal for the upgrade to a new wireless meter reading system. As you can see, the cost is significant. Consequently, South Shore Lakes believe that good cause exists pursuant to Section 291.123(d) to change from submetered to allocated billing. The residents currently sign a Texas Apartment Association form lease which indicated that they will be responsible for water and wastewater and also sign a "Lease Addendum for Water/Wastewater Submeter Billing in Apartments" and receive the "Tenant Guide to Submetered Water or Wastewater Service". It is South Shore Lakes' intent to provide existing residents 35-day notice of the new allocation and request their written approval of such modification following Section 291.123(c). This would typically only occur upon new leases and when existing tenants renew their lease.

South Shore Lakes intends to use the following allocation system: deduct five (5%) of the water/wastewater bill to account for common area and allocate the remaining ninety-five (95%) back to the residents based a factor using a combination of square footage and occupancy in which no more than 50% is based on square footage per Section 291.124(e)(ii)(A)(iv). There is no irrigation is in use at the property but common usage is included in the master meter, therefore the common usage deducted will be 5% per Section 291.124(e)(1)(B)(iv).

Please provide written approval of the conversion to water allocation billing for South Shore Lakes. If you have any questions, please do not hesitate to contact me.

Sincerely,

Michaela Smith
Regional Vice President
Trinity Property Consultants

enc: (1)

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TCEQ WATER SUPPLY
2009 NOV 12 PM 3:45



QUARTERLY DIAGNOSTIC REPORT

7/17/2009

South Shore Lakes

Current # of Meter Errors: 130

Current Operating Level: 60.4%

Warranty Status

AUM Labor Warranty Expiration Date: N/A - System was not installed by AUM

Parts & Materials Warranty Expiration Date: N/A - System was not installed by AUM

System Information

Units: 328

Utility Measured - Method of Measurement: **Water - Full Capture**

Description of Meter Equipment: **Phase I - Manually Read with AMCO 3/4" V100 meters and digital read pad Phase II - Hexagram Dual port with AMCO 3/4" V100 meters**

Access/Modem Number: TBD

Error Type	Number of Units
High Consumption	0
Low Consumption	0
No Consumption	44
Broken Transmitter	86
Broken Repeater	0
See attached Diagnostic Worksheet for specific unit information	

Estimated Repair Charges	
Labor: \$	500.00
Parts & Materials: \$	39,982.00
Subtotal: \$	40,482.00
Warranty Coverage: \$	-
Estimate Total: \$	40,482.00

AUM Scope of Work

No Consumption and Broken Transmitters

1) Enter unit and run water to check function of meter. 2) Replace meter or read switch if not operable. 3) Connect continuity tester to leads at transmitter. 4) Run enough water to generate pulse. 5) Check status of transmitter & battery and replace if not operable. 6) Force transmission from meter to transmitter. 8) Verify read was received at end point/data collector.

High Consumption

1) Check the number of people living in unit. 2) Check all toilets, faucets, showers, etc. for running water. Inspect and test each toilet (place food coloring in tank and inspect for food coloring in bowl after 5 - 10 minutes). 3) Make notes and provide to property office and AUM staff.

Low Consumption

1) Enter unit and run water to check function of meter. 2) Replace meter or read switch if not operable. 3) Verify unit is occupied. 4) Verify unit is not a model. 5) Are tenants in the military? 6) Do tenants travel extensively? 7) Make notes and provide to property office and AUM staff.

To Approve - Please Sign Below

If the terms of this estimate are acceptable, please sign and date in the space provided below and return a copy to AUM. Upon receiving an approved report AUM will schedule the service call, notify the property and order the necessary parts. Warranty coverage does not include damage to systems caused by users, residents, maintenance personnel or modification to measured equipment.

Signature

Date

I hereby understand and agree with all the terms listed above and authorize AUM to perform the work as described above and invoice accordingly. I am authorized to approve this work and approve payment of such work.

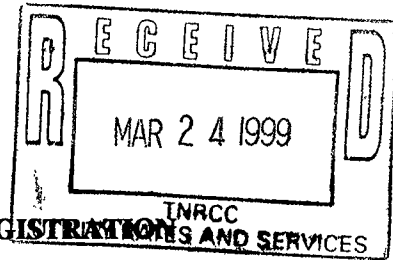
**** AUM SERVICE REQUIRED - Please sign and date to authorize repairs**

1-800-418-5393

SUBMETERED UTILITY SERVICE REGISTRATION
(Texas Natural Resource Conservation Commission form)

TEXAS NATURAL RESOURCE CONSERVATION COMMISSION

51232



SUBMETERED UTILITY SERVICE REGISTRATION AND SERVICES
Registration No. _____
(TNRCC Use Only)

OWNER INFORMATION

Name: South Shore Lakes, Ltd.

Address: 1177 W. Loop So. #1475 Houston, Texas Phone: (713) 871-0063

Tax Identification No.: 76-0564244

Name & Location of Facility Where Submetered Service is Provided:

South Shore Lakes 888-344-4441

3850 FM 518 East League City, Texas 77573

Check One: ☒ Apartment ☐ Mobile Home Park ☐ Condominium

☐ Multiple Use Facility (Describe): _____

MANAGEMENT INFORMATION (If Different From Above)

Company Name: Hettig Management Corp. n7027

Address: 1177 W. Loop So. #1475 Houston, Texas Phone: (713) 871-0063

CONTACT INFORMATION FOR QUESTIONS OR COMPLAINTS

Name: Darlene Guidry Phone: (713) 871-0063

INFORMATION ON SUBMETERED SERVICE

Utility Providing Water/Wastewater: City of League City Water Utilities Dept

Date Submetering Begins (or Began): 3/15/99

Please attach a copy of the billing form that will be used and a copy of the rental agreement stating that the utility service is submetered. Mail to: Water Utilities Division, TNRCC
Utility Certification & Rate Design Section
P. O. Box 13087
Austin, Texas 78711

Questions?: Call Consumer Assistance, Water Utilities Division, TNRCC--512/239-6100