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REPLY TO:
P.O. BOX 4547
HOUSTON, TEXAS 77210

January 14, 2022

Chris Burch, Director
Customer Protection
Public Utility Commission of Texas

RE: Request by Abbey – Dominion Crossing (the “Owner”), TCEQ Registration No. S8123, the Owner of the Abbey at Dominion Crossing located at 21626 Stonewall Parkway, San Antonio, TX 78256 (the “Property”) to change from submetered to allocated water billing.

Dear Mr. Burch:

The undersigned attorney and law firm represent the Owner. The purpose of this letter is to request your approval for the Owner to change from submetered to allocated water billing.

The property is a 334 unit apartment community. The Owner has experienced significant problems with its submetering equipment. The manufacturer of the submetering equipment is Next Century. 124 of the 334 units in the apartment community are not reporting usage. This is an operating level of 62%.

The batteries powering the meters will fail which causes the meters to stop reading and reporting water usage without warning. Owner only finds out if there is an issue when the Pre-bill is sent from Conservice to the Property to approve resident billing.

A technician has been called to the Property to inspect the submeters and he submitted a proposal of service. It took the technicians over 60 days to respond to a request for service. Due to COVID-19 the submetering technician company expects repairs to take 60-120 days due to a back up in service calls. Meter replacement by a third party is estimated to cost at least \$13,817 which is not economically feasible. In order to maintain the economic viability of the Property, Owner needs to institute an allocated billing system.

Prior to the meter issues, Owner was able to recover between 92% and 97% for an average of 94.25% of the water and sewer expense. However, since the issues began, September’s water and sewer expense recovery was 75.27% and October’s water and sewer expense recovery was 81.47%. Therefore, the Owner has lost \$2,720.35 in just two months.

Finally, due to the age of the submeters, the property will start experiencing ongoing issues and the expenses to maintain the submeters and loss of revenue will continue to persist.

In light of the foregoing, we request approval from your office to change from a submetered billing system to an allocated billing system. We appreciate your prompt consideration and response.

Very truly yours,

HOOVER SLOVACEK LLP

By: /s/ Michael Bailey

Michael J. Bailey

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CY 2022 Registration of Submetered OR Allocated Utility Service

Control Number: **52942**
 Registration No.: S8123
 (this number to be assigned by the PUC after your form is filed)

NOTE: Please **DO NOT** include any person or protected information on this form (ex: tax identification #'s, social security #'s, etc.)

PROPERTY OWNER: Do **not** enter the name of the owner's contract manager, management company, or billing company.

Name	Abbey - Dominion Crossing						
Mailing Address:	21626 Stonewall Parkway	City	San Antonio	State	TX	Zip	78256
Telephone# (AC)							
E-mail							

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

Name	Abbey - Dominion Crossing						
Mailing Address:	21626 Stonewall Parkway	City	San Antonio	State	TX	Zip	78256
Telephone# (AC)							
E-mail							

<input checked="" type="checkbox"/> Apartment Complex	<input type="checkbox"/> Condominium	<input type="checkbox"/> Manufactured Home Rental Community	<input type="checkbox"/> Multiple-Use Facility
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If applicable, describe the "multiple-use facility" here:

INFORMATION ON UTILITY SERVICE

Tenants are billed for	<input checked="" type="checkbox"/> Water	<input checked="" type="checkbox"/> Wastewater	<input checked="" type="checkbox"/> Submetered <u>OR</u>	<input type="checkbox"/> Allocated ★★★
Name of utility providing water/wastewater	San Antonio Water System			
Date submetered or allocated billing begins (or began)	February 1, 2017	Required		

METHOD USED TO OFFSET CHARGES FOR COMMON AREAS Check one line only.

<input checked="" type="checkbox"/> Not applicable, because	<input checked="" type="checkbox"/> Bills are based on the tenant's actual submetered consumption
<input type="checkbox"/> 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 ★★★

You can e-file this form online through the PUC Interchange Filer (<https://interchange.puc.texas.gov/filer>).
 - You can find instructions for E-Filing at <https://www.puc.texas.gov/industry/filings/E-FilingInstructions.pdf>.

Or you may mail **one** copy to:
 For USPS:

For all other delivery or courier services:

Public Utility Commission of Texas Central Records
 P.O. Box 13326
 Austin, TX 78711-3326

Public Utility Commission of Texas Central Records
 1701 N. Congress Ave., 8-100
 Austin, TX 78701

METHOD USED TO ALLOCATE UTILITY CHARGES

Check the box or boxes that describe the allocation method used to bill tenants.

<input type="checkbox"/>	1. 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 month for which bills are being rendered.
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<input checked="" type="checkbox"/>	2. Ratio occupancy method:		Number of Occupants for Billing Purposes
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.		Number of Occupants	
		1	1.0
		2	1.6
		3	2.2
		>3	2.2 + 0.4 for each additional occupant

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

For Box #4: if you check off with the % you will need to choose #1, #2, or # 3 from above as the remainder of no more than 50%.

4. Occupancy and size of rental unit	percent (in which no more than 50%) of the utility bill for consumption is allocated using the occupancy method checked above. The remainder is allocated according to either:
<ul style="list-style-type: none"> 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. 	

<input type="checkbox"/>	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.	

<input type="checkbox"/>	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.	

<input type="checkbox"/>	As outlined in the condominium contract. Describe:

<input type="checkbox"/>	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.	

<input type="checkbox"/>	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.	