



Control Number: 52942



Item Number: 879

SILVERBROOKE APARTMENTS
1020 Brand Lane
Stafford, TX 77477

2022 JUL 20 AM 8:49
STAFFORD, TX 77477

July 12, 2022

Executive Director
Texas Public Utility Commission
Attention: Records
William B. Travis Building
1701 N. Congress Avenue, 7th Floor
Austin, Texas 78701

Re: Silverbrooke Apartments
1020 Brand Lane, Stafford, TX 77477

Dear Sir/Madam:

In accordance with Texas Public Utility Commission (“PUC”) Rule 24.279(d) entitled “Change from Sub-Metered to Allocated Billing” this correspondence and the accompanying exhibit shall serve as formal request by Silverbrooke Apartments (“Silverbrooke”) to convert from sub-metering billing to allocated or RUBS billing. Silverbrooke contends there is “good cause” for the PUC to approve this conversion request as demonstrated herein due to equipment failure.

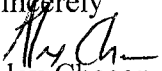
Silverbrooke bills its residents per a water sub-metering system. Silverbrooke has 360 apartment units. The water sub-meters at Silverbrooke are approximately fifteen (15) years old. Over the last two years the community has experienced systematic failure of the water sub-metering system. For example, from October – November of 2021 approximately 97 of the 360 water sub-meters were not functioning properly. This spring (e.g., March – April of 2022) the number of non-operating water sub-meters increased to 138 out of 360.

Recently, Silverbrooke had representatives of Minol, a local sub-metering company, perform an assessment whereby it was determined approximately 152 water sub-meters need to be replaced at a cost of \$25,655.75. (*See copy of water sub-metering replacement proposal attached as Appendix Exhibit 1*). It is expected the remaining 208 water sub-meters will need to be replaced shortly, and at a minimum additional cost of \$35,108.32.

Though Silverbrooke understands the advantage of billing its residents per a water sub-metering methodology, replacing the current system will create undue economic hardship for the owners of the community. Consequently, Silverbrooke is respectfully requesting the PUC approve the request to convert from a water sub-metering methodology to an allocated methodology; conditional on Silverbrooke fulfilling the requirements set forth in PUC Rule 24.279.

Please advise if you have any questions or need any additional information. My contact information is 281.822.9178 or my cell at 409.599.8494.

Sincerely


Alex Chacon

Encl: Installation Proposal



UTILITY SUBMETERING SERVICE AUTHORIZATION FORM

Date:	04/24/22	Property ID:	1459010
Property Name:	SILVERBROOKE [RO]	Scheduled Repair Date(s):	From: To:
Contact:	SHIYARA PERERA	Work Authorization#:	1459010-220422101900
Address:	1020 BRAND LN	Technician:	
City:	STAFFORD	Created By:	JBOYD
State:	TX	Account Manager:	JBOYD
Zip Code:	77477	Charge Code:	Billable
Phone:	905-764-5940		
Fax:	999-999-9999		
Email:	sperera@onecornerstone.com	Status:	SVC Review Done

As with any electronic system, parts can fail or a system can become inoperative due to unforeseen circumstances (phone line issues, resident tampering, wiring problems, etc). The Minol Meter Reading and Service Dept. has detected problems with your system and it is in need of service. **Since regulations limit the period in which resident submeters can be estimated immediate service is crucial.**

Please find below an estimated cost of labor to troubleshoot submetering system issues. If it is determined that replacement parts are needed to complete repairs, we will get your authorization prior to performing work. Final Service cost is associated to the degree of failure and is based upon quantity and type of replacement parts needed and the amount of labor. Since this cannot be determined until a qualified technician checks the equipment on-site, we have only estimated the amount of labor needed to troubleshoot and repair your issues. The Minol service technician will need to obtain approval for charges from an authorized property representative prior to replacing any equipment. If an authorization cannot be obtained for the equipment at the time of the technician's visit, a return trip will be required which will incur additional labor charges. We have included a list of applicable buildings and/or units which have been affected.

Qty	Description	Price per Unit	
152	PARTS & LABOR	\$168.79	\$25,655.75
CHARGES WILL BE BILLED TO CUSTOMER			
			Est. Total: \$25,655.75

OWNER SERVICE WORK AUTHORIZATION

Please Initial one option below, sign & return to Minol via fax at 877-791-4765 to prevent any delays in scheduling. Work will not be scheduled until a signed authorization is received by the Minol Service Department.

I authorize MINOL to provide a technician to evaluate and complete all necessary utility submetering system repairs. I understand that if the equipment is no longer under Warranty or work is not covered by Extended Warranty, then all repair costs are the responsibility of the owner. I also understand that it is the responsibility of the property owner to send resident written notices prior to the technician's arrival. Please see attached page for a list of applicable units.

I DO NOT authorize Minol to complete repairs at this time. I understand that I have been notified and that the property owner is responsible for any resident billing interruptions or delays attributed to equipment failure.

Signature of responsible party: _____ Date: _____

Name and Title (printed): _____

I understand that if the Minol technician cannot complete the work due to property issues (keys, resident availability, etc.) then the property will be charged a No Access fee equaling the estimated labor rate for that unit.

Scheduling	

IMPORTANT NOTICE

Property Name: SILVERBROOKE [RO]

Management office phone# _____

Delivery Date _____

Unit Address: _____

Unit # _____

Dear Resident _____

This letter serves as a 48-hour notice to you that a representative from **Minol** will be accessing your apartment in order to complete repairs on the automated sub-metering equipment located in your apartment. Please make any necessary arrangements to have pets secured or relocated from the area where the technician will be working.

Repairs have been scheduled for _____ during the normal Management Office hours of operation.

Please be aware that if you fail to allow access for the above scheduled service, repairs will not be completed and you acknowledge that future meter readings associated to your utility consumption may be estimated until service can be rescheduled. Your presence for service is optional.

We appreciate your cooperation and look forward to providing you with exceptional service. Please note that Minol Technicians wear identification badges. In addition, you may also contact the Management Office if you should have any questions.

Sincerely,

Property Management
SILVERBROOKE [RO]

Resident File
Minol Service Department via fax

Please send 24-48 hour notice to the units listed below:

Bldg	Unit	TransID	AMR#	Issue	Comments
0002	000111(O)	17062057	2685678935	NT WA	1020 BRAND LN UNIT 1.SILVERBROOKE [RO]
0002	000113(V)	17062056	2685678965	NT WA	1020 BRAND LN UNIT 1.SILVERBROOKE [RO]
0002	000116(V)	17062093	2685680278	NT WA	1020 BRAND LN UNIT 1.SILVERBROOKE [RO]
0002	000117(V)	17062055	2685678967	NT WA	1020 BRAND LN UNIT 1.SILVERBROOKE [RO]
0002	000126(V)	17062088	2685677803	NT WA	1020 BRAND LN UNIT 1.SILVERBROOKE [RO]
0002	000127(V)	17062090	2685677797	NT WA	1020 BRAND LN UNIT 1.SILVERBROOKE [RO]
0002	000128(V)	17062095	2685677757	NT WA	1020 BRAND LN UNIT 1.SILVERBROOKE [RO]
0002	000133(V)	17062062	2685678959	NT WA	1020 BRAND LN UNIT 1.SILVERBROOKE [RO]
0002	000137(V)	17062089	2685677774	NT WA	1020 BRAND LN UNIT 1.SILVERBROOKE [RO]
0002	000138(V)	17062096	2685680287	NT WA	1020 BRAND LN UNIT 1.SILVERBROOKE [RO]
0002	000212(V)	17062487	2685678177	NT WA	1020 BRAND LN UNIT 2.SILVERBROOKE [RO]
0002	000213(V)	17062486	2685678163	NT WA	1020 BRAND LN UNIT 2.SILVERBROOKE [RO]
0002	000214(V)	17062470	2685678929	NT WA	1020 BRAND LN UNIT 2.SILVERBROOKE [RO]
0002	000215(V)	17062467	2685678939	NT WA	1020 BRAND LN UNIT 2.SILVERBROOKE [RO]
0002	000216(V)	17062473	2685678522	NT WA	1020 BRAND LN UNIT 2.SILVERBROOKE [RO]
0002	000218(V)	17062476	2685678518	NT WA	1020 BRAND LN UNIT 2.SILVERBROOKE [RO]
0002	000222(V)	17062484	2685676027	NT WA	1020 BRAND LN UNIT 2.SILVERBROOKE [RO]
0002	000223(V)	17062485	2685678169	NT WA	1020 BRAND LN UNIT 2.SILVERBROOKE [RO]
0002	000225(V)	17062468	2685678936	NT WA	1020 BRAND LN UNIT 2.SILVERBROOKE [RO]
0002	000226(V)	17062474	2685677739	NT WA	1020 BRAND LN UNIT 2.SILVERBROOKE [RO]
0002	000227(V)	17062475	2685678536	NT WA	1020 BRAND LN UNIT 2.SILVERBROOKE [RO]
0002	000228(V)	17062206	2685676126	NT WA	1020 BRAND LN UNIT 2.SILVERBROOKE [RO]
0002	000233(V)	17062471	2685678714	NT WA	1020 BRAND LN UNIT 2.SILVERBROOKE [RO]
0002	000237(V)	19040131	2685774933	NT WA	1020 BRAND LN UNIT 2.SILVERBROOKE [RO]
0002	000238(V)	19040133	2685774894	NT WA	1020 BRAND LN UNIT 2.SILVERBROOKE [RO]
0002	000311(V)	17061805	2685677623	NT WA	1020 BRAND LN UNIT 3.SILVERBROOKE [RO]
0002	000313(V)	17061803	2685677680	NT WA	1020 BRAND LN UNIT 3.SILVERBROOKE [RO]
0002	000314(V)	17061916	2685680250	NT WA	1020 BRAND LN UNIT 3.SILVERBROOKE [RO]
0002	000315(V)	17061919	2685678341	NT WA	1020 BRAND LN UNIT 3.SILVERBROOKE [RO]
0002	000316(V)	17060132	2685676191	NT WA	1020 BRAND LN UNIT 3.SILVERBROOKE [RO]
0002	000318(V)	17057894	2685680554	NT WA	1020 BRAND LN UNIT 3.SILVERBROOKE [RO]
0002	000321(V)	17061800	2685677651	NT WA	1020 BRAND LN UNIT 3.SILVERBROOKE [RO]
0002	000322(V)	17061801	2685677614	NT WA	1020 BRAND LN UNIT 3.SILVERBROOKE [RO]
0002	000323(V)	17061802	2685678465	NT WA	1020 BRAND LN UNIT 3.SILVERBROOKE [RO]
0002	000326(V)	17060133	2685671875	NT WA	1020 BRAND LN UNIT 3.SILVERBROOKE [RO]
0002	000328(V)	17057890	2685671496	NT WA	1020 BRAND LN UNIT 3.SILVERBROOKE [RO]
0002	000333(V)	17057895	2685671405	NT WA	1020 BRAND LN UNIT 3.SILVERBROOKE [RO]
0002	000334(V)	17061915	2685678411	NT WA	1020 BRAND LN UNIT 3.SILVERBROOKE [RO]
0002	000337(V)	17061914	2685678365	NT WA	1020 BRAND LN UNIT 3.SILVERBROOKE [RO]
0002	000411(V)	17061794	2685678300	NT WA	1020 BRAND LN UNIT 4.SILVERBROOKE [RO]
0002	000412(V)	17060128	2685671900	NT WA	1020 BRAND LN UNIT 4.SILVERBROOKE [RO]
0002	000413(V)	17062148	2685677748	NT WA	1020 BRAND LN UNIT 4.SILVERBROOKE [RO]
0002	000414(V)	17062152	2685677744	NT WA	1020 BRAND LN UNIT 4.SILVERBROOKE [RO]
0002	000417(V)	17060135	2685676272	NT WA	1020 BRAND LN UNIT 4.SILVERBROOKE [RO]
0002	000418(V)	17060137	2685676212	NT WA	1020 BRAND LN UNIT 4.SILVERBROOKE [RO]
0002	000432(V)	17060129	2685676186	NT WA	1020 BRAND LN UNIT 4.SILVERBROOKE [RO]
0002	000437(V)	18030823	2685733823	NT WA	1020 BRAND LN UNIT 4.SILVERBROOKE [RO]
0002	000513(V)	17061774	2685677641	NT WA	1020 BRAND LN UNIT 5.SILVERBROOKE [RO]
0002	000516(V)	19040034	2685781938	NT WA	1020 BRAND LN UNIT 5.SILVERBROOKE [RO]
0002	000518(V)	17061929	2685678306	NT WA	1020 BRAND LN UNIT 5.SILVERBROOKE [RO]
0002	000522(V)	17061775	2685676140	NT WA	1020 BRAND LN UNIT 5.SILVERBROOKE [RO]
0002	000523(V)	17061770	2685677685	NT WA	1020 BRAND LN UNIT 5.SILVERBROOKE [RO]
0002	000524(V)	17060394	2685688052	NT WA	1020 BRAND LN UNIT 5.SILVERBROOKE [RO]
0002	000533(V)	17061930	2685678310	NT WA	1020 BRAND LN UNIT 5.SILVERBROOKE [RO]
0002	000537(V)	17060393	2685671970	NT WA	1020 BRAND LN UNIT 5.SILVERBROOKE [RO]
0002	000611(V)	17062204	2685676204	NT WA	1020 BRAND LN UNIT 6.SILVERBROOKE [RO]
0002	000612(V)	17062199	2685676107	NT WA	1020 BRAND LN UNIT 6.SILVERBROOKE [RO]
0002	000613(V)	17062200	2685676145	NT WA	1020 BRAND LN UNIT 6.SILVERBROOKE [RO]
0002	000614(V)	17062197	2685676117	NT WA	1020 BRAND LN UNIT 6.SILVERBROOKE [RO]
0002	000615(V)	17062219	2685676157	NT WA	1020 BRAND LN UNIT 6.SILVERBROOKE [RO]
0002	000617(V)	17062217	2685678903	NT WA	1020 BRAND LN UNIT 6.SILVERBROOKE [RO]
0002	000622(V)	17062201	2685676165	NT WA	1020 BRAND LN UNIT 6.SILVERBROOKE [RO]
0002	000623(V)	17062196	2685676161	NT WA	1020 BRAND LN UNIT 6.SILVERBROOKE [RO]
0002	000624(V)	17062198	2685676110	NT WA	1020 BRAND LN UNIT 6.SILVERBROOKE [RO]
0002	000625(V)	17062215	2685678890	NT WA	1020 BRAND LN UNIT 6.SILVERBROOKE [RO]
0002	000626(V)	17062216	2685676123	NT WA	1020 BRAND LN UNIT 6.SILVERBROOKE [RO]
0002	000627(V)	17062495	2685678171	NT WA	1020 BRAND LN UNIT 6.SILVERBROOKE [RO]

Please sign, date and fax back as soon as possible to MInol Service Dept at 877-791-4763
 Questions regarding this request? Call 888-766-1253

Continued...

Please send 24-48 hour notice to the units listed below:

Bldg	Unit	TransID	AMR#	Issue	Comments
0002	000633(V)	17062492	2685678132	NT WA	1020 BRAND LN UNIT 6:SILVERBROOKE [RO]
0002	000634(V)	19040031	2685781762	NT WA	1020 BRAND LN UNIT 6:SILVERBROOKE [RO]
0002	000638(V)	17062493	2685678184	NT WA	1020 BRAND LN UNIT 6:SILVERBROOKE [RO]
0002	000712(V)	17062099	2685680316	NT WA	1020 BRAND LN UNIT 7:SILVERBROOKE [RO]
0002	000717(V)	17062208	2685676115	NT WA	1020 BRAND LN UNIT 7:SILVERBROOKE [RO]
0002	000718(V)	17062211	2685678887	NT WA	1020 BRAND LN UNIT 7:SILVERBROOKE [RO]
0002	000721(V)	17062097	2685680315	NT WA	1020 BRAND LN UNIT 7:SILVERBROOKE [RO]
0002	000724(V)	17062127	2685671756	NT WA	1020 BRAND LN UNIT 7 SILVERBROOKE [RO]
0002	000728(V)	17062213	2685676121	NT WA	1020 BRAND LN UNIT 7:SILVERBROOKE [RO]
0002	000737(V)	19040032	2685774720	NT WA	1020 BRAND LN UNIT 7:SILVERBROOKE [RO]
0002	000738(V)	19040035	2685781158	NT WA	1020 BRAND LN UNIT 7:SILVERBROOKE [RO]
0002	000815(V)	17088924	2685698941	NT WA	1020 BRAND LN UNIT 8:SILVERBROOKE [RO]
0002	000817(V)	17088925	2685699046	NT WA	1020 BRAND LN UNIT 8:SILVERBROOKE [RO]
0002	000824(V)	17088917	2685697610	NT WA	1020 BRAND LN UNIT 8:SILVERBROOKE [RO]
0002	000825(V)	17088916	2685697601	NT WA	1020 BRAND LN UNIT 8:SILVERBROOKE [RO]
0002	000827(V)	17088913	2685697617	NT WA	1020 BRAND LN UNIT 8:SILVERBROOKE [RO]
0002	000911(V)	17074535	2685674330	NT WA	1020 BRAND LN UNIT 9:SILVERBROOKE [RO]
0002	000912(V)	17074081	2685694037	NT WA	1020 BRAND LN UNIT 9:SILVERBROOKE [RO]
0002	000913(V)	17074080	2685675349	NT WA	1020 BRAND LN UNIT 9:SILVERBROOKE [RO]
0002	000915(V)	17074132	2685675269	NT WA	1020 BRAND LN UNIT 9:SILVERBROOKE [RO]
0002	000916(V)	17074128	2685675197	NT WA	1020 BRAND LN UNIT 9:SILVERBROOKE [RO]
0002	000917(V)	17074118	2685680085	NT WA	1020 BRAND LN UNIT 9 SILVERBROOKE [RO]
0002	000918(V)	17074117	2685675332	NT WA	1020 BRAND LN UNIT 9.SILVERBROOKE [RO]
0002	000921(V)	17074530	2685674347	NT WA	1020 BRAND LN UNIT 9.SILVERBROOKE [RO]
0002	000924(V)	17074133	2685680164	NT WA	1020 BRAND LN UNIT 9:SILVERBROOKE [RO]
0002	000925(V)	17074130	2685675294	NT WA	1020 BRAND LN UNIT 9:SILVERBROOKE [RO]
0002	000926(V)	17074129	2685675175	NT WA	1020 BRAND LN UNIT 9:SILVERBROOKE [RO]
0002	000928(V)	17074120	2685675270	NT WA	1020 BRAND LN UNIT 9:SILVERBROOKE [RO]
0002	000934(V)	17074131	2685680132	NT WA	1020 BRAND LN UNIT 9:SILVERBROOKE [RO]
0002	000937(V)	17074116	2685680151	NT WA	1020 BRAND LN UNIT 9:SILVERBROOKE [RO]
0002	001011(V)	17074095	2685675196	NT WA	1020 BRAND LN UNIT 1:SILVERBROOKE [RO]
0002	001013(V)	17074093	2685680082	NT WA	1020 BRAND LN UNIT 1:SILVERBROOKE [RO]
0002	001014(V)	17060148	2685676234	NT WA	1020 BRAND LN UNIT 1:SILVERBROOKE [RO]
0002	001015(V)	17074523	2685683856	NT WA	1020 BRAND LN UNIT 1.SILVERBROOKE [RO]
0002	001016(V)	17074521	2685679179	NT WA	1020 BRAND LN UNIT 1.SILVERBROOKE [RO]
0002	001017(V)	17060150	2685676281	NT WA	1020 BRAND LN UNIT 1:SILVERBROOKE [RO]
0002	001018(V)	17074110	2685680081	NT WA	1020 BRAND LN UNIT 1:SILVERBROOKE [RO]
0002	001021(V)	17074096	2685680107	NT WA	1020 BRAND LN UNIT 1:SILVERBROOKE [RO]
0002	001024(V)	17074519	2685683785	NT WA	1020 BRAND LN UNIT 1:SILVERBROOKE [RO]
0002	001025(V)	17074522	2685679178	NT WA	1020 BRAND LN UNIT 1:SILVERBROOKE [RO]
0002	001026(V)	17074520	2685679150	NT WA	1020 BRAND LN UNIT 1:SILVERBROOKE [RO]
0002	001027(V)	17060146	2685676309	NT WA	1020 BRAND LN UNIT 1:SILVERBROOKE [RO]
0002	001033(V)	17060151	2685676213	NT WA	1020 BRAND LN UNIT 1:SILVERBROOKE [RO]
0002	001037(V)	17060147	2685676210	NT WA	1020 BRAND LN UNIT 1:SILVERBROOKE [RO]
0002	001038(V)	17060149	2685676516	NT WA	1020 BRAND LN UNIT 1:SILVERBROOKE [RO]
0002	001111(V)	17074533	2685674354	NT WA	1020 BRAND LN UNIT 1:SILVERBROOKE [RO]
0002	001112(V)	17060161	2685676284	NT WA	1020 BRAND LN UNIT 1:SILVERBROOKE [RO]
0002	001113(V)	17060163	2685676219	NT WA	1020 BRAND LN UNIT 1.SILVERBROOKE [RO]
0002	001114(V)	17060158	2685676209	NT WA	1020 BRAND LN UNIT 1.SILVERBROOKE [RO]
0002	001118(V)	17074122	2685675336	NT WA	1020 BRAND LN UNIT 1:SILVERBROOKE [RO]
0002	001121(V)	17074532	2685674318	NT WA	1020 BRAND LN UNIT 1:SILVERBROOKE [RO]
0002	001123(V)	17060160	2685676308	NT WA	1020 BRAND LN UNIT 1.SILVERBROOKE [RO]
0002	001124(V)	17073918	2685680103	NT WA	1020 BRAND LN UNIT 1:SILVERBROOKE [RO]
0002	001125(V)	17073923	2685675265	NT WA	1020 BRAND LN UNIT 1.SILVERBROOKE [RO]
0002	001127(V)	17074123	2685680155	NT WA	1020 BRAND LN UNIT 1:SILVERBROOKE [RO]
0002	001128(V)	17074127	2685675120	NT WA	1020 BRAND LN UNIT 1:SILVERBROOKE [RO]
0002	001133(V)	17060159	2685676271	NT WA	1020 BRAND LN UNIT 1.SILVERBROOKE [RO]
0002	001138(V)	17074125	2685675341	NT WA	1020 BRAND LN UNIT 1:SILVERBROOKE [RO]
0002	001211(V)	17088959	2685697509	NT WA	1020 BRAND LN UNIT 1.SILVERBROOKE [RO]
0002	001216(V)	17088956	2685697646	NT WA	1020 BRAND LN UNIT 1.SILVERBROOKE [RO]
0002	001217(V)	17092662	2685692643	NT WA	1020 BRAND LN UNIT 1:SILVERBROOKE [RO]
0002	001228(V)	17092673	2685699097	NT WA	1020 BRAND LN UNIT 1.SILVERBROOKE [RO]
0002	001313(V)	17093192	2685699478	NT WA	1020 BRAND LN UNIT 1.SILVERBROOKE [RO]
0002	001322(V)	17093188	2685692275	NT WA	1020 BRAND LN UNIT 1:SILVERBROOKE [RO]
0002	001324(V)	17093190	2685692377	NT WA	1020 BRAND LN UNIT 1:SILVERBROOKE [RO]
0002	001334(V)	17093189	2685692528	NT WA	1020 BRAND LN UNIT 1.SILVERBROOKE [RO]
0002	001411(V)	17092650	2685699577	NT WA	1020 BRAND LN UNIT 1.SILVERBROOKE [RO]

Please sign, date and fax back as soon as possible to Minol Service Dept at 877-791-4763
 Questions regarding this request? Call 888-766-1253

Continued...

