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BELTERRA APARTMENTS
7001 Sandshell Boulevard
Fort Worth, TX 76137

January 25, 2023

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

Re: Belterra Apartments
7001 Sandshell Boulevard, Fort Worth, TX 76137

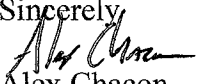
Dear Sir/Madam:

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 Belterra Apartments (“Belterra”) to convert from sub-metering billing to allocated or RUBS billing. Belterra contends there is “good cause” for the PUC to approve this conversion request as demonstrated herein due to equipment failure.

Belterra bills its residents for water and sewer per a water sub-metering system. Belterra has 288 apartment units. The water sub-meters at Belterra are approximately seventeen (17) years old. Over the last four (4) years the community experienced systematic failure of the water sub-metering system. Meter failure started in 2019. In January 2021 approximately 55 of the 288 meters failed, and in December of 2022 approximately 97 of the 288 meters were not functioning properly. *See copy of report attached as Appendix Exhibit 1.* Recently, Belterra conducted a cost assessment to repair the meters and it was determined the repair cost would be more than \$17,000.

Though Belterra 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, Belterra is respectfully requesting the PUC approve the request to convert from a water sub-metering methodology to an allocated methodology; conditional on Belterra 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: Report

CRS Property Schedule 245

Reported as of 12/29/2022

Belterra(TX4BL) - Summary of invoice charges considered for Schedule 245

Note: Charges that have no CRS mapping are shown in **red**
 Note: Charges for irrigation meters are shown in **blue** (these are excluded from billing)
 [1] The total excludes irrigation charges that have a mapping set to 'Ex irrigation'.
 [2] These are the mappings in effect when this schedule was created.

Vendor	Account	Invoice #	Period Start	Period End	Cost Type	Description	Consumption	Amount [1]	Allocable Amount	Current Mapping [2]
CITY OF FORT WORTH WATER DEPARTMENT	1453353-470484									
		CRS1453353-470484_NOV-22_479826	10/19/2022	11/17/2022	Other Fees-Other	EP ENVIR. PROTECT. FEE	0 Dollars	\$144.00	\$144.00	Apt Ratio
		CRS1453353-470484_NOV-22_479826	10/19/2022	11/17/2022	Other Fees-Other	SW STORM WATER UTILITY	0 Dollars	\$914.25	\$914.25	Apt Ratio
		CRS1453353-470484_NOV-22_479826	10/19/2022	11/17/2022	Water-Water	WA SERVICE CHARGE	0 CCF	\$2,520.40	\$2,520.40	Apt Ratio
		CRS1453353-470484_NOV-22_479826	10/19/2022	11/17/2022	Water-Water	WA @ \$2.69	1277.1 CCF	\$3,435.40	\$3,435.40	A-Sub Wtr
		CRS1453353-470484_NOV-22_479826	10/19/2022	11/17/2022	Water-Wastewater	VWV SERVICE CHARGE	0 CCF	\$1,082.60	\$1,082.60	Apt Ratio
		CRS1453353-470484_NOV-22_479826	10/19/2022	11/17/2022	Water-Wastewater	VWV @ \$4.06	0 CCF	\$5,185.03	\$5,185.03	A-Sub Sew
		CRS1453353-470484_NOV-22_479826	10/19/2022	11/17/2022	Water-Irrigation	YD SERVICE CHARGE	0 CCF	\$150.00	\$0.00	Ex irrigation
		CRS1453353-470484_NOV-22_479826	10/19/2022	11/17/2022	Water-Irrigation	YD @ \$3.01	62.3 CCF	\$187.52	\$0.00	Ex irrigation
		CRS1453353-470484_NOV-22_479826	10/19/2022	11/17/2022	Water-Irrigation	YD @ \$3.01	50 CCF	\$150.50	\$0.00	Ex irrigation
		CRS1453353-470484_NOV-22_479826	10/19/2022	11/17/2022	Water-Irrigation	YD @ \$3.90	103.3 CCF	\$402.87	\$0.00	Ex irrigation
		CRS1453353-470484_NOV-22_479826	10/19/2022	11/17/2022	Other Fees-Other	EP EPF Leasing Office	0 Dollars	\$10.00	\$0.00	Ex irrigation
		CRS1453353-470484_NOV-22_479826	10/19/2022	11/17/2022	Other Fees-Other	EPF Leasing Office	0 Dollars	\$0.00	\$0.00	Ex irrigation
		CRS1453353-470484_NOV-22_479826	10/19/2022	11/17/2022	Water-Irrigation	@ \$4.25	0 CCF	\$0.00	\$0.00	Ex irrigation
		CRS1453353-470484_NOV-22_479826	10/19/2022	11/17/2022	Water-Water	ADJUSTMENTS	0 Gallons	\$0.00	\$0.00	
								\$13,281.68	\$13,281.68	

CRS Property Schedule 245

Reported as of 12/29/2022

Belterra(TX4BL) - Submeter Exceptions

Note: lines shown in red could not be estimated because there wasn't enough history.

Cost Type	Error	Bldg	Unit	Meter ID	Consumption	Number of months in error	Amount Estimated	Days Prorated
Water								
	High Read for 3 occupant(s)	11	11213	1111213	491605	2	\$32.45	30
		1						
	No valid reading	01	117	1117	0	5	\$12.51	30
	No valid reading	01	130	1130	0	17	\$22.74	30
	No valid reading	01	132	1132	0	7	\$12.51	30
	No valid reading	01	133	1133	0	1	\$4.17	10
	No valid reading	01	134	1134	0	25	\$30.95	30
	No valid reading	01	136	1136	0	18	\$19.16	30
	No valid reading	02	221	2221	0	11	\$12.51	30
	No valid reading	02	222	2222	-656013	3	\$48.83	30
	No valid reading	02	231	2231	0	6	\$12.51	30
	No valid reading	02	235	2235	0	9	\$21.15	30
	No valid reading	03	316	3316	0	6	\$12.51	30
	No valid reading	03	317	3317	0	14	\$48.95	30
	No valid reading	03	331	3331	0	24	\$36.07	30
	No valid reading	03	334	3334	0	10	\$12.51	30
	No valid reading	03	335	3335	0	13	\$12.51	30
	No valid reading	04	410	4410	0	20	\$31.85	30
	No valid reading	04	412	4412	-817781	1	\$80.53	30
	No valid reading	04	413	4413	0	29	\$32.71	30
	No valid reading	04	414	4414	0	3	\$12.51	30
	No valid reading	04	415	4415	0	2	\$22.67	30
	No valid reading	04	416	4416	0	14	\$12.51	30
	No valid reading	04	417	4417	-736591	3	\$63.08	30
	No valid reading	04	419	4419	0	15	\$20.67	30
	No valid reading	04	421	4421	0	14	\$20.24	30
	No valid reading	04	423	4423	-335341	1	\$12.51	30
	No valid reading	04	424	4424	0	14	\$12.51	30
	No valid reading	04	428	4428	0	9	\$12.51	30
	No valid reading	05	514	5514	0	24	\$20.08	30
	No valid reading	05	519	5519	0	31	\$29.25	30
	No valid reading	05	528	5528	0	4	\$12.51	30
	No valid reading	05	536	5536	0	10	\$12.51	30
	No valid reading	06	611	6611	0	14	\$12.51	30
	No valid reading	06	615	6615	0	30	\$21.85	30
	No valid reading	06	617	6617	0	7	\$12.51	30

CRS Property Schedule 245

Reported as of 12/29/2022

Belterra(TX4BL) - Submeter Exceptions

Note: lines shown in red could not be estimated because there wasn't enough history.

Cost Type	Error	Bldg	Unit	Meter ID	Consumption	Number of months in error	Amount Estimated	Days Prorated
Water								
	No valid reading	06	620	6620	0	3	\$145.88	30
	No valid reading	06	623	6623	0	6	\$12.51	30
	No valid reading	06	626	6626	0	10	\$29.91	30
	No valid reading	06	631	6631	0	3	\$12.51	30
	No valid reading	07	710	7710	0	2	\$12.51	30
	No valid reading	07	732	7732	0	8	\$12.51	30
	No valid reading	07	734	7734	0	18	\$19.16	30
	No valid reading	07	736	7736	0	24	\$26.31	30
	No valid reading	07	737	7737	0	1	\$4.59	11
	No valid reading	08	813	8813	0	23	\$28.39	30
	No valid reading	08	814	8814	0	1	\$6.67	16
	No valid reading	08	815	8815	0	21	\$21.57	30
	No valid reading	08	816	8816	0	18	\$19.19	30
	No valid reading	08	821	8821	0	29	\$25.18	30
	No valid reading	08	823	8823	0	18	\$19.16	30
	No valid reading	08	824	8824	0	20	\$20.60	30
	No valid reading	08	826	8826	0	10	\$12.51	30
	No valid reading	09	912	9912	0	2	\$37.14	30
	No valid reading	09	913	9913	0	3	\$12.51	30
	No valid reading	09	914	9914	0	31	\$12.51	30
	No valid reading	09	917	9917	0	29	\$35.23	30
	No valid reading	09	918	9918	0	31	\$24.08	30
	No valid reading	09	923	9923	0	5	\$12.51	30
	No valid reading	09	924	9924	0	17	\$22.74	30
	No valid reading	09	927	9927	0	1	\$7.09	17
	No valid reading	09	928	9928	0	23	\$21.31	30
	No valid reading	09	933	9933	0	31	\$34.47	30
	No valid reading	09	9210	99210	0	5	\$12.51	30
	No valid reading	09	9213	99213	0	2	\$12.51	30
	No valid reading	10	1014	101014	0	6	\$12.51	30
	No valid reading	10	1015	101015	0	24	\$24.62	30
	No valid reading	10	1016	101016	0	23	\$49.07	30
	No valid reading	10	1017	101017	-1181	2	\$12.51	30
	No valid reading	10	1023	101023	0	7	\$12.51	30
	No valid reading	10	1024	101024	0	33	\$23.79	30

CRS Property Schedule 245

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Belterra(TX4BL) - Submeter Exceptions

Note: lines shown in red could not be estimated because there wasn't enough history.

Cost Type	Error	Bldg	Unit	Meter ID	Consumption	Number of months in error	Amount Estimated	Days Prorated
Water								
	No valid reading	10	1025	101025	0	31	\$21.45	30
	No valid reading	10	1027	101027	0	10	\$12.51	30
	No valid reading	10	1030	101030	0	14	\$12.51	30
	No valid reading	10	1032	101032	0	3	\$12.51	30
	No valid reading	10	1036	101036	0	23	\$26.53	30
	No valid reading	11	1110	111110	0	20	\$38.03	30
	No valid reading	11	1112	111112	0	9	\$22.00	30
	No valid reading	11	1113	111113	0	4	\$12.51	30
	No valid reading	11	1114	111114	0	20	\$34.26	30
	No valid reading	11	1115	111115	0	20	\$56.21	30
	No valid reading	11	1117	111117	0	14	\$12.51	30
	No valid reading	11	1118	111118	0	20	\$35.24	30
	No valid reading	11	1119	111119	0	3	\$12.51	30
	No valid reading	11	1120	111120	0	16	\$24.14	30
	No valid reading	11	1121	111121	0	2	\$44.02	30
	No valid reading	11	1123	111123	0	20	\$29.72	30
	No valid reading	11	1124	111124	0	9	\$12.51	30
	No valid reading	11	1126	111126	0	27	\$27.43	30
	No valid reading	11	1134	111134	0	11	\$33.39	30
	No valid reading	11	1135	111135	0	15	\$12.51	30
	No valid reading	11	1138	111138	0	8	\$12.51	30
	No valid reading	11	1139	111139	0	31	\$26.15	30
	No valid reading	11	11110	1111110	0	21	\$31.51	30
	No valid reading	11	11113	1111113	0	9	\$12.51	30
	No valid reading	11	11210	1111210	0	6	\$12.51	30
	No valid reading	11	11212	1111212	0	6	\$12.51	30
	No valid reading	11	11310	1111310	0	11	\$12.51	30
	No valid reading	11	11312	1111312	0	2	\$12.51	30
		97						
Total # of Exceptions:		98						



CY 2023 Registration of Submetered OR Allocated Utility Service

Control Number: **54440**
 Registration No.: _____
 (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	Venterra Realty						
Mailing Address:	20333 Hwy 249 Suite 650	City	Houston	State	TX	Zip	77070
Telephone# (AC)	409-599-8494						
E-mail	AChacon@venterraliving.com						

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

Name	VR Belterra Holdings, LP						
Mailing Address:	7001 Sandshell Boulevard	City	Ft. Worth	State	TX	Zip	76137
Telephone# (AC)	682-327-1548						
E-mail	AChacon@venterraliving.com						

<input type="checkbox"/> Apartment Complex	<input checked="" type="checkbox"/>	<input type="checkbox"/> Condominium	<input type="checkbox"/>	<input type="checkbox"/> Manufactured Home Rental Community	<input type="checkbox"/>	<input type="checkbox"/> Multiple-Use Facility
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 type="checkbox"/>	Submetered <u>OR</u>	<input checked="" type="checkbox"/>	Allocated ★★ ★
Name of utility providing water/wastewater		Fort Worth Water Department						
Date submetered or allocated billing begins (or began)				03/01/23		Required		

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

<input type="checkbox"/> Not applicable, because	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.

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.

<input type="checkbox"/> 2. Ratio occupancy method: 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	Number of Occupants for Billing Purposes
	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: 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	Number of Occupants for Billing Purposes
	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 | 50% | 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:

- 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.

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.

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.

As outlined in the condominium contract. Describe:

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.

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.