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PARK ON WURZBACH APARTMENTS
4707 Wurzbach Road
San Antonio, TX 78238

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:

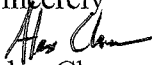
In accordance with Texas Public Utility Commission (“PUC”) Rule 24.279(d) entitled “Change from Sub-Metered to Allocated Billing” this correspondence and the accompanying exhibit shall serve as formal request by Park on Wurzbach Apartments (“Wurzbach”) to convert from sub-metering billing to allocated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

Wurzbach bills its residents for water and sewer per a water sub-metering system. Wurzbach has 264 apartment units. The water sub-meters at Wurzbach are failing. Currently, approximately 40 meters are failing and due to the age of the sub-metering system, it is only a matter of time until there is systematic failure of the community’s entire water sub-metering system. *See copy of report attached as Appendix Exhibit 1.* Recently, Wurzbach conducted a cost assessment to repair the meters and it was determined the repair cost would be more than \$7,000.

Though Wurzbach 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, Wurzbach is respectfully requesting the PUC approve the request to convert from a water sub-metering methodology to an allocated methodology; conditional on Wurzbach 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 01/13/2023

Wurzbach(TX4WZ) - 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]
SAN ANTONIO WATER SYSTEM 001350548-2713390-0002										
		CRS001350548-2713390-0002_NOV-22_	11/04/2022	12/05/2022	Water-Water	DOMESTIC WATER SERVICE CHARGE	241636 Gallons	\$534.15	\$534.15	A-Sub Wtr
		CRS001350548-2713390-0002_NOV-22_	11/04/2022	12/05/2022	Water-Water	WATER SUPPLY FEE	0 Gallons	\$722.25	\$722.25	A-Sub Wtr
		CRS001350548-2713390-0002_NOV-22_	11/04/2022	12/05/2022	Water-Water	EDWARDS AQUIFER AUTHORITY FEE	0 Gallons	\$81.79	\$81.79	A-Sub Wtr
		CRS001350548-2713390-0002_NOV-22_	11/04/2022	12/05/2022	Water-Water	SEWER SERVICE CHARGE	0 Gallons	\$1,035.05	\$1,035.05	A-Sub Sew
		CRS001350548-2713390-0002_NOV-22_	11/04/2022	12/05/2022	Water-Water	STATE-IMPOSED TCEQ FEE	0 Gallons	\$35.64	\$35.64	A-Sub Sew
		CRS001350548-2713390-0002_NOV-22_	11/04/2022	12/05/2022	Water-Deposit	DEPOSIT APPLIED	0 Dollars	\$0.00	\$0.00	
								\$2,408.88	\$2,408.88	
SAN ANTONIO WATER SYSTEM 001350556-2716373-0002										
		CRS001350556-2716373-0002_NOV-22_	11/04/2022	12/05/2022	Water-Irrigation	IRRIGATION WATER CHARGE	0 Gallons	\$377.01	\$0.00	Ex irrigation
		CRS001350556-2716373-0002_NOV-22_	11/04/2022	12/05/2022	Water-Irrigation	WATER SUPPLY FEE	53115 Gallons	\$332.91	\$0.00	Ex irrigation
		CRS001350556-2716373-0002_NOV-22_	11/04/2022	12/05/2022	Water-Irrigation	EDWARDS AQUIFER AUTHORITY FEE	0 Gallons	\$17.98	\$0.00	Ex irrigation
		CRS001350556-2716373-0002_NOV-22_	11/04/2022	12/05/2022	Water-Irrigation	STORMWATER FEE	0 Gallons	\$136.63	\$0.00	Ex irrigation
		CRS001350556-2716373-0002_NOV-22_	11/04/2022	12/05/2022	Water-Deposit	Deposit Applied	0 Dollars	\$0.00	\$0.00	
		CRS001350556-2716373-0002_NOV-22_	11/04/2022	12/05/2022	Water-Irrigation	OTHER CHARGES	0 Gallons	\$0.00	\$0.00	
								\$0.00	\$0.00	
SAN ANTONIO WATER SYSTEM 001350562-2719005-0002										
		CRS001350562-2719005-0002_NOV-22_	11/04/2022	12/05/2022	Water-Water	DOMESTIC WATER SERVICE CHARGE	377042 Gallons	\$779.24	\$779.24	A-Sub Wtr
		CRS001350562-2719005-0002_NOV-22_	11/04/2022	12/05/2022	Water-Water	WATER SUPPLY FEE	0 Gallons	\$1,126.98	\$1,126.98	A-Sub Wtr
		CRS001350562-2719005-0002_NOV-22_	11/04/2022	12/05/2022	Water-Water	EDWARDS AQUIFER AUTHORITY FEE	0 Gallons	\$127.63	\$127.63	A-Sub Wtr
		CRS001350562-2719005-0002_NOV-22_	11/04/2022	12/05/2022	Water-Wastewater	SEWER SERVICE CHARGE	0 Gallons	\$1,598.21	\$1,598.21	A-Sub Sew
		CRS001350562-2719005-0002_NOV-22_	11/04/2022	12/05/2022	Water-Water	STATE-IMPOSED TCEQ FEE	0 Gallons	\$35.64	\$35.64	A-Sub Sew
		CRS001350562-2719005-0002_NOV-22_	11/04/2022	12/05/2022	Water-Deposit	DEPOSIT APPLIED	0 Dollars	\$0.00	\$0.00	
								\$3,667.70	\$3,667.70	

CRS Property Schedule 245

Reported as of 01/13/2023

Wurzbach(TX4WZ) - 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 4 occupant(s)	1	1102	11102	11535	1	\$0.00	3
	High Read for 2 occupant(s)	1	1306	11306	149220	2	\$17.75	32
	High Read for 2 occupant(s)	2	2101	22101	120050	2	\$0.00	32
	High Read for 1 occupant(s)	3	3304	33304	6720	1	\$51.52	32
	High Read for 2 occupant(s)	5	5304	55304	152720	2	\$36.73	32
	High Read for 2 occupant(s)	7	7108	77108	109960	7	\$0.00	32
	High Read for 3 occupant(s)	8	8210	88210	198440	12	\$127.04	32
	High Read for 1 occupant(s)	9	9212	99212	73540	12	\$0.00	32
	High Read for 1 occupant(s)	10	10102	1010102	104980	2	\$0.00	32
	High Read for 3 occupant(s)	10	10105	1010105	76860	2	\$0.00	32
	High Read for 1 occupant(s)	10	10206	1010206	9910	3	\$0.00	32
	High Read for 2 occupant(s)	11	11102	1111102	239020	7	\$0.00	32
		12						
	Low Read for 1 occupant(s)	6	6209	66209	12	1	\$0.00	6
		1						
	No valid reading	2	2108	22108	0	6	\$0.00	32
	No valid reading	2	2303	22303	0	7	\$8.62	32
	No valid reading	4	4212	44212	0	4	\$15.72	32
	No valid reading	5	5106	55106	0	2	\$0.00	32
	No valid reading	5	5210	55210	-141130	1	\$34.61	32
	No valid reading	7	7105	77105	-75650	1	\$28.19	32
	No valid reading	7	7212	77212	0	2	\$14.29	32
	No valid reading	7	7301	77301	-156610	1	\$0.00	32
	No valid reading	7	7304	77304	0	2	\$5.97	32
	No valid reading	8	8107	88107	-159680	1	\$64.97	32
	No valid reading	8	8207	88207	0	4	\$0.00	32
	No valid reading	8	8301	88301	0	2	\$0.00	32
	No valid reading	8	8304	88304	-91380	1	\$12.43	32
	No valid reading	9	9102	99102	0	2	\$26.52	32
	No valid reading	9	9103	99103	0	9	\$9.49	32
	No valid reading	9	9106	99106	-86680	1	\$24.09	32
	No valid reading	9	9202	99202	-100780	3	\$19.21	32
	No valid reading	9	9211	99211	0	2	\$0.00	32
	No valid reading	9	9303	99303	-130210	1	\$0.00	27
	No valid reading	10	10108	1010108	-72840	1	\$0.00	32
	No valid reading	10	10308	1010308	0	12	\$0.00	32
	No valid reading	11	11106	1111106	0	15	\$21.50	32



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 Wurzbach, LP						
Mailing Address:	4707 Wurzbach Road	City	San Antonio	State	TX	Zip	78238
Telephone# (AC)	833-550-0251						
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		San Antonio Water System						
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.