

## **Filing Receipt**

Filing Date - 2023-07-31 03:50:28 PM

Control Number - 54440

Item Number - 999

## Mission Mayfield Downs 2901 East Mayfield Rd. Grand Prairie, TX 75052

July 31,2023

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

Re: Mission Mayfield Downs Apartments 2901 East Mayfield Rd, Grand Prairie TX 75052

Dear Sir/Madam:

In accordance with Texas Public Utility Commission ("PUC") Rule 24.279(d) entitled "Change from Sub-Metered to Allocated Billing" this shall serve as formal request by VR Mayfield Limited Partnership ("Mission Mayfield") to convert from sub-metering billing to allocated or RUBS billing. Mission Mayfield contends there is "good cause" for the PUC to approve this conversion request as demonstrated herein due to equipment failure.

Mission Mayfield bills its residents per a water sub-metering system. Mission Mayfield has 258 apartment units. The water sub-meters at Mission Mayfield are approximately eleven (11) years old. Since purchasing the community in 2022 we have noted a systematic failure of the installed meter systems. As of July, the number of non-operating and malfunctioning water sub-meters numbers 95 out of 258, more than 35% of the community.

The replacement cost of approximately 95 water sub-meters needing to be replaced would come at a cost of \$16,035 (\$168.79 per meter) It is expected the remaining 163 water sub-meters will need to be replaced in the near future, and at a minimum additional cost of \$27,512.

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

Alejandro Chacon Ancillary Services Analyst Venterra Realty

| CY 2023 Registration of Submetered OR Control Number: 54440   |       |  |  |  |  |  |  |  |
|---|-------|--|--|--|--|--|--|--|
| Allocated Utility Service   Registration No.:     (this number to be assigned by the  |       |  |  |  |  |  |  |  |
| Allocated Utility Service (this number to be assigned by the PUC after your form is filed)  |       |  |  |  |  |  |  |  |
| 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 650CityHoustonStateTXZip77070  | -     |  |  |  |  |  |  |  |
| Telephone# (AC) 4095998494  |       |  |  |  |  |  |  |  |
| E-mail achacon@venterraliving.com   | -     |  |  |  |  |  |  |  |
| NAME, ADDRESS, AND TYPE OF PROPERTY WHERE UTILITY SERVICE IS PROVIDED   |       |  |  |  |  |  |  |  |
| Name VR: Mayfield Limited Partnership   | 3     |  |  |  |  |  |  |  |
| Mailing Address: 2901 East Mayfield Rd. City Grand Prairie State TX Zip 75052   |       |  |  |  |  |  |  |  |
| Telephone# (AC) 972-641-9600  |       |  |  |  |  |  |  |  |
| E-mail achacon@venterraliving.com   |       |  |  |  |  |  |  |  |
| ×     Apartment Complex     Condominium     Manufactured Home Rental Community     Multiple-Use Facility                              | ity   |  |  |  |  |  |  |  |
| If applicable, describe the "multiple-use facility" here:   |       |  |  |  |  |  |  |  |
| INFORMATION ON UTILITY SERVICE  |       |  |  |  |  |  |  |  |
| Tenants are billed for X Water X Submetered OR X Allocated ★★   | ₹<br> |  |  |  |  |  |  |  |
| Name of utility providing water/wastewater City of Grand Prairie Water Utilities  |       |  |  |  |  |  |  |  |
| Date submetered or allocated billing begins (or began) 09/01/2023 Required  |       |  |  |  |  |  |  |  |
| METHOD USED TO OFFSET CHARGES FOR COMMON AREAS Check one line only.   |       |  |  |  |  |  |  |  |
| Not applicable, because     Bills are based on the tenant's actual submetered consumption   |       |  |  |  |  |  |  |  |
| There are <u>neither</u> common areas <u>nor</u> 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 amor<br>our tenants. | g     |  |  |  |  |  |  |  |
| This property has an installed irrigation system that is <u>not</u> 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 utilit           | v's   |  |  |  |  |  |  |  |
| total charges for water and wastewater consumption, then allocate the remaining charges among our tenants.                            | y 3   |  |  |  |  |  |  |  |
| This property does <u>not</u> 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 ther              |       |  |  |  |  |  |  |  |
| allocate the remaining charges among our tenants.   |       |  |  |  |  |  |  |  |
|   |       |  |  |  |  |  |  |  |
| ** *IF UTILITY SERVICES ARE ALLOCATED, YOU MUST ALSO COMPLETE PAGE TWO OF THIS FORM * 7   | * *   |  |  |  |  |  |  |  |
| 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 <b>one</b> copy to: For all other delivery or courier services:   |       |  |  |  |  |  |  |  |
| For USPS:   |       |  |  |  |  |  |  |  |
| Public Utility Commission of Texas Central Records Public Utility Commission of Texas Central Records                                 |       |  |  |  |  |  |  |  |
| P.O. Box 13326 1701 N. Congress Ave., 8-100   |       |  |  |  |  |  |  |  |
| Austin, TX 78711-3326 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.

| 2. Ratio occupancy method:                              |                     | Number of Occupants for                |
|---|---------------------|--|
|   | Number of Occupants | Billing Purposes                       |
| The number of occupants in the tenant's dwelling unit   | 1                   | 1.0                                    |
| is adjusted as shown in the table to the right. This    | 2                   | 1.6                                    |
| adjusted value is divided by the total of these values  | 3                   | 2.2                                    |
| for all dwelling units occupied at the beginning of the | >3                  | 2.2 + 0.4 for each additional occupant |
| retail public utility's billing period.                 |                     | -                                      |

| 3. Estimated occupancy method:  | Number of      | Number of Occupants for               |
|---|----------------|---------------------------------------|
|   | Bedrooms       | Billing Purposes                      |
| The estimated occupancy for each unit is based on the   | 0 (Efficiency) | 1                                     |
| number of bedrooms as shown in the table to the   | 1              | 1.6                                   |
| right. The estimated occupancy in the tenant's  | 2              | 2.8                                   |
| dwelling unit is divided by the total estimated   | 3              | 4.0                                   |
| occupancy in all dwelling units regardless of the actual number of occupants or occupied units. | >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 reminder of no more than 50%.

| 5   | < | 4. Occupancy and size of rental unit | 50 | percent ( <b>in which no more than 50%</b> ) 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.