SP Residential, LLC
Water Submetering Application
Exhibit C-2a

*Provide as **Exhibit C-2a** all documents provided to the tenant describing the tenant's rights under Sections 16-11-67(1)-(3) and the procedures with respect to tenant inquiries concerning the submetering system, the operation of the submetering system, reading of submeters, and billing for water service.*

Attachments include:

Submetering Information for Residents of The August at Steelpointe Harbor

Submetered Water Service Notice of Tenant Rights

SUBMETERING INFORMATION FOR RESIDENTS
OF THE AUGUST AT STEELPOINTE HARBOR APARTMENTS

Aquarion Water Company of Connecticut ("Aquarion") is the water company that provides water service to The August at Steelpointe Harbor. Aquarion bills SP Residential, LLC for all water service provided to the property, including the water used by residents of each apartment home and water used for common purposes, such as watering the lawn or maintaining the pool.

Water service provided to The August at Steelpointe Harbor is subject to regulation by Connecticut's Public Utilities Regulatory Authority (the "Authority"). The Authority has determined that pursuant to Section 16-11-55, Aquarion is not required to install an individual meter in each apartment home for water service at The August at Steelpointe Harbor. Property Manager has received approval to install and operate a water submetering system at The August at Steelpointe Harbor. That means that the Property Manager may install a separate water meter (a "submeter") for each apartment home at The August at Steelpointe Harbor to measure the amount of water used by the residents of that apartment home.

To encourage conservation and assure that each resident pays only for the water that he or she has consumed, Property Manager has installed a submetering system at The August at Steelpointe Harbor.

Property Manager has arranged with RealPage, Inc. ("RealPage") to read each submeter and generate a monthly *bill* for water usage *in* each apartment home at The August at Steelpointe Harbor. The amount of your bill for water usage generated by RealPage is calculated by multiplying the number of gallons of water used by your apartment home in that month by the cost per gallon for water charged by Aquarion to The August at Steelpointe Harbor. Property Manager and RealPage have not marked up your charge for water and are not making a profit on the water charge in your bill from RealPage. Property Manager and RealPage are simply passing the cost on to you as the consumer of the water. The Authority has authorized RealPage to charge $4.00/month for providing submetering service. The Authority requires residents receive some or all, of the following information regarding submetered apartments.

WHOM DO I CONTACT REGARDING WATER SERVICE ISSUES?

Report any ***leaks or loss of service*** immediately to the Property Manager at 317-816-9300**,** at any time of the day or night on any day of the year. You may also report leaks or loss of service to the office during normal business hours as posted.

If you have any questions concerning ***water volume, taste, odor or other water quality issues,*** please first contact the Property Manager at 317-816-9300, and the Property Manager shall contact the local water company that services and bills The August at Steelpointe Harbor, on your behalf. If you are unable to contact the Property Manager in an emergency, or if you are dissatisfied with Property Manager's response to the issue, you may call the local water utility, Aquarion, at (203)445-7310 or toll-free at (800)732-9678. Under certain circumstances, Aquarion may bill the property owner, and the property owner shall be responsible for a service call charge for responding to a call from a tenant.

If you are not satisfied with the Property Manager's response or Aquarion's response to any concern or complaint that you have regarding water volume, taste, odor, or other water quality issues, please contact the Department of Public Health, Water Supply (the "DPH"), 410 Capitol Avenue, Hartford, CT 06134, 860-509-7333. The DPH, rather than the Authority, regulates these aspects of the provision of water service.

If you have any ***questions regarding your bill, the submetering process or testing of the submeter,*** please contact RealPage at 1-800-590-7355, Monday - Friday, 7 a.m. to 7 p.m. Central Standard Time, Saturday, 9 a.m. to 6 p.m. Central Standard Time. You may also obtain account information via the resident portal website. For your reference, this information will be included on your monthly statement as well.

If you are not satisfied with the response from RealPage, please contact the Property Manager for customer inquiries and complaints:

Andy Keidel
SP Residential, LLC
1 Indiana Square, Suite 3000
Indianapolis, KN 46204
Telephone: 317-816-9300

RealPage and the Property Manager will respond promptly to your concerns.

The Authority regulates the Property Manager's right to submeter. You may report any complaints or concerns that you have regarding submetering directly to the Authority at any time by contacting the Authority at Ten Franklin Square, New Britain CT 06051, consumer assistance telephone number 1-800-382-4586; TDD 860-827-2837; facsimile 860-827- 2613; website: www.ct.gov/pura. You may file a complaint with the Authority if you do not receive a satisfactory resolution of any concern you have regarding submetering from RealPage, or the Property Manager. Although you are free to contact the Authority at any time, the Property Manager and RealPage request that you allow us an opportunity to resolve your concern or complaint.

HOW DOES THE SUBMETERING SERVICE WORK?

The $/gallon charge that you pay for water will be stated on your monthly bill. Aquarion, rather than the Property Manager or RealPage sets the rate charged for water. If you would like information regarding the rate, or rate classification applied by Aquarion to The August at Steelpointe Harbor, please contact the Property Manager.

Your monthly bill from RealPage will state the submeter readings at the beginning and end of the billing cycle, the dates on which those readings were obtained, the number of gallons consumed in that billing cycle, the $/gallon charge, the gross or net amount of the bill for that month, the date on which the bill was mailed, the date by which payment must be made, the address at which payment can be made, and the telephone number and hours of operation of RealPage's Customer Service Center.

The submeter system is computerized. An on-site data collection device records the amount of water used in your apartment home on a daily basis. RealPage will remotely read your unit's submeter on a daily basis by retrieving the stored data from the on-site data collection device through a telephone modem to an off-site computer system at the RealPage headquarters. RealPage will import and process the data, generate a monthly bill for your apartment home and mail you that bill. The water data is stored for 90 days on the on-site data collection system, and RealPage stores this water data for five (5) years. The back-up system is on RealPage's server located at 2201 Lakeside Blvd. in Richardson, Texas.

Aquarion charges The August at Steelpointe Harbor on a $/CCF basis. However, RealPage will charge you on a $/gallon basis because the submeter will measure in gallons.

The submeter is located in the utility closet of your unit. You may access the utility closet and examine the submeter in order to read and/or monitor water consumption. Property Manager does not read your submeter or otherwise monitor your water consumption but can request a reading from RealPage.

If there is a technical problem obtaining a read through the remote reading equipment, you will receive an estimated bill. Where such data is available, the estimated bill will be based on the average gallon/month usage of the most recent three monthly bills sent to you. Where such data is not available, the estimated bill will be based on 2,100 gallon/month usage. The bill will be clearly identified as an "estimated bill."

Property Manager receives from RealPage a billing preview report detailing unit usage prior to sending resident bills. Property Manager will investigate reports of abnormally high consumption to determine whether there is a leak or some other problem that requires repair. That investigation may involve contacting you by telephone and/or making a physical inspection of the plumbing in your apartment home. Entry into your apartment home for this purpose will be in accordance with the provisions of your lease.

Property Manager will generate a work order for each report of an abnormally high consumption. The Property Manager will keep a copy of the work order that describes the report received from RealPage along with the action taken by the Property Manager for three years. This information is available for inspection by you and the Authority. If the abnormally high consumption was because of a leak or other problem that requires a repair, you will receive a copy of the work order that will describe the repair made. If the investigation reveals a problem resulting from damage you caused to the submeter or equipment, we may bill you for the cost of repairing or replacing the equipment.

HOW IS THE SUBMETER MAINTAINED AND TESTED?

The Property Manager and RealPage will work together to maintain and test the submeter as required by the manufacturer. Entry into your apartment home to complete these procedures will be performed in accordance with the provisions of your lease.

Section 16-11-89 of the Authority's Regulations defines your right to request a test of the submeter and our obligations in response to such a request. (1) If you want your submeter tested, you must make a written request for the test to the Property Manager. If the submeter within the twelve-month period prior to your request was not tested, and if you agree to abide by the results of any such test as the basis for adjustment of any disputed charges, we must perform the test at no charge to you. Otherwise, you can be charged for the test. (2) Within one week of receiving your written request for a test, the Property Manager will notify you in writing that you or your authorized representative has the right to be present at the test. If you or your authorized representative wish to be present at the test, you must contact the Property Manager within ten days of the written notification to arrange to be present at the test. Upon receipt of such notification from you, the Property Manager shall schedule a meter test, at a time that is convenient to both the customer, or his or her authorized representative, and the testing company, as soon as possible. (3) You will receive a written report of the results of the test.

Property Manager will arrange to have an independent third-party vendor who specializes in meter testing conduct the test of the submeter at your apartment home. If the test shows that the submeter is not accurately measuring water usage, the Property Manager will replace the submeter. The Property Manager will then work with you to adjust your water bill. If the test shows that the submeter is accurately measuring water usage, and you disagree with the accuracy of the test, the Property Manager will replace the submeter and send the submeter to a testing facility for a retest. Upon receipt of a written report from the test facility of the test of the submeter, the Property Manager will contact you. If the results of the retest show that the submeter was not accurately measuring water usage, the Property Manager will work with you to adjust your bill.

Additionally, Section 16-259 of the Connecticut General Statutes provides that upon your request to the Authority, and your payment of a ten-dollar ($10) fee to the Authority, the Authority may direct the Property Manager to inspect the water meter. If the submeter does not register accurately within a limit of variation prescribed by the Authority for that type of meter, the Property Manager is obligated to reimburse you the ten-dollar ($10) fee you paid to the Authority. The Property Manager will replace the submeter at no cost to you and, if the submeter was not accurately measuring water usage, will work with you to adjust your bill.

If you would like more information regarding the test or inspection procedure or maintenance requirements for the submeter, please contact the Property Manager.

OTHER INFORMATION REGARDING WATER BILLING

You will receive your monthly bill directly from RealPage. The bill will state both the payment due date and the mailing date. Your payment will be considered overdue and your account identified as delinquent if payment is not received within 33 calendar days after the mailing date. You will be assessed a late payment charge of $5.00 if your payment is not received within 33 calendar days after the mailing date. Please contact Real Page's customer service number listed on the billing statement, if you have further questions regarding your payment options or other terms of payment.

There is no security deposit for water service; however, any unpaid balances or other amounts related to your water service may be deducted from your security deposit in accordance with the terms of your lease.

The Property Manager will maintain all data regarding the payment status of your account. The Property Manager will contact you to discuss your account if your account is delinquent. Collection of past due amounts on delinquent accounts will be the responsibility of the Property Manager and will be performed in accordance with the terms of your lease and the requirements of State and Federal law.

The Property Manager will notify RealPage as to the day that you move in to your apartment home and the day that you move out. RealPage will read your submeter on that date to assure that your bill is only for the consumption during the period in which you were residing in your apartment home.

If you receive a bill that is incorrect due to meter or billing errors, the bill will be adjusted in accordance with the requirements of Section 16-11-71 of the Regulations, which states as follows:

> (1) Whenever a meter in service is tested and found to have over-registered more than two per cent, the utility shall adjust the customer's bill for the excess amount paid as determined below.
>
> > (A) If the time at which the error first developed or occurred can be definitely determined, the amount of overcharge shall be based thereon.
> >
> > (B) If the time at which the error first developed or occurred cannot be definitely determined, it shall be assumed that the over-registration existed for a period equal to one-half of the time since the meter was last tested. If more than one customer received service through the fast meter during the period for which the refund is due, a refund shall be paid to the present customer only for the time during which he received service through the meter.
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> (2) Whenever a meter in service is found not to register, the utility may render an estimated bill. The utility shall estimate the charge for the water used by averaging the amount registered over a similar period preceding or subsequent to the period of non-registration or for a corresponding period in previous years, adjusting for any changes in the customer's usage. When it is found that the error in a meter is due to some cause, the date of which can be fixed, the overcharge or the undercharge shall be computed back to but not beyond such date.
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> (3) Billing adjustments due to fast meters shall be calculated on the basis that the meter should be one hundred per cent accurate. For the purpose of billing adjustment, the meter error shall be one-half of the algebraic sum of the error at maximum test flow plus the error at intermediate test flow.
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> (4) When a customer has been overcharged as a result of incorrect reading of the meter, incorrect calculation of the bill, incorrect connection of the meter or other similar reasons, the amount of the overcharge shall be adjusted, refunded or credited to the customer.
>
> (5) When a customer has been undercharged as a result of incorrect reading of the meter, incorrect calculation of the bill, incorrect connection of the meter or other similar reasons, the amount of the undercharge may be billed to the customer.

If you receive a bill for water service that you believe is in error, please contact RealPage. If you are not satisfied with RealPage's response, please contact the Property Manager.

SUBMETERED WATER SERVICE
NOTICE OF TENANT RIGHTS

Tenants who have their water service submetered (that is, metered and billed by the landlord or its billing agent, rather than by the local utility company) are entitled to certain consumer rights. They include:

- Submetering shall be permitted only with the approval of the Public Utilities Regulatory Authority.
- The right to be notified by the landlord of a pending change in rate or rate classification by Aquarion Water.
- The right to avoid termination (shut-off) of your water service. The landlord may shut-off water service for safety or emergency reasons.
- The right to request one meter accuracy test in a twelve-month period at no charge. Tenant must submit request in writing to the Property Manager. If the Tenant desires to be present at the meter test, the Tenant shall contact the Property Manager within 10 (ten) days of the written notification. Upon such notification, the Property Manager will schedule a meter test, at a time during the normal operating hours of the company conducting the test, which is convenient to both the testing company and the Tenant. A written report of the test results shall be provided to the Tenant.
- Tenant has a right to an adjustment of his water bill. Reasons for adjusting a tenant's bill include changes in meter readings due to a damaged or non-functioning submeter and when an actual read occurs after an estimated reading of the submeter. If a Tenant is overcharged due to an error, Property Manager will adjust the bill or issue a refund. If a Tenant is undercharged because of an incorrect meter read or bill calculation, the undercharge may be billed to the Tenant.
- The right to dispute a bill. Tenants are advised to first contact RealPage at (800) 590-7355 for questions regarding their utility bill. If the tenant is not satisfied with the response from RealPage, the tenants are advised to contact the Property Manager at 203-496-0771.
- Tenants have until the 33rd day from the issuance date of the bill to avoid a late payment fee of $5.00.
- Tenant question or concerns regarding pressure, volume, taste, odor, or other water quality issues should be directed first to the Property Manager at 203-496-0771, during normal business hours or in an after-hours emergency at 203-496-0771. If a tenant is unable to reach the Property Manager in an emergency, or if the tenant is dissatisfied with the Property Manager's response to a problem, then the tenant may call Aquarion Water Company at (203) 445-7310; any Tenant who is dissatisfied with the response from the Property Management, or from the utility, should contact the Department of Public Health ("DHP") at (860) 509-7333.
- Tenant has the right to contact the Connecticut Public Utilities Regulatory Authority[i] if you have an unresolved complaint, issue, concern, or billing issue. If you are unable to resolve your bill dispute with the landlord, you may request in writing to the Connecticut Public Utilities Regulatory Authority to further investigate your dispute.

[i] You can write to PURA at Ten Franklin Square, New Britain, CT 06051. PURA's consumer services lines is available toll free in Connecticut at 800-382-4586. You may also access PURA's webpage at http://www.ct.gov/pura