SP Residential, LLC
Water Submetering Application
Exhibit D-1: Customer Service and Complaint Handling

THE AUGUST AT STEELPOINTE HARBOR
SUBMETERING COMPLIANCE MANUAL

GENERAL REQUIREMENTS

1. The Connecticut Public Utility Regulatory Authority (the "Authority") regulates water service to certain communities, specifically SP Residential, LLC, and has authorized the Property Manager to install and operate a water submetering system at Greenwich Landing Apartments. This manual defines additional specific procedures which management will need to follow to ensure compliance with the Authority's requirements for submetering services for this property. Property Manager will promptly advise RealPage of any changes in the Authority's requirements for submetering in writing; and as necessary, will update this manual.

2. Upon execution of the lease and/or as part of the move-in package provided to residents, Property Manager shall provide each Resident with the Submetering Information and Tenants Rights which includes all Resident notice information required by the Authority. Please review and familiarize yourself with these documents to ensure adequate preparation in responding to Resident inquiries.

3. Property Manager will periodically review the Resident service procedures and operations to assure compliance with the requirements of the Authority's submetering regulations. Property Manager will undertake that review by staying familiar with all information documents provided as well as contacting RealPage's Client Relations Manager.

4. Property Manager is required to provide the Authority with 10 days' notice prior to changing any form or procedure, and such change(s) shall not be made prior to receiving written notification of Authority approval that the change(s) can be made.

5. Upon request from Property Manager, RealPage's Client Relations Manager will promptly provide management with a report of the fines paid by RealPage (if any) in the preceding twelve-month period with respect to any violations of all state or federal submetering or consumer protection regulatory requirements.

6. Property Manager must provide written approval of the pre-bill to authorize RealPage to bill residents monthly.

RECORD KEEPING REQUIREMENTS

1. The Authority's Regulations require records of Resident complaints concerning submetering be retained for three (3) years after the date on which the complaint was resolved. The Authority may review submetering complaint records and billing records for Property Manager.

1.1. Property Manager shall maintain records of all complaints directed to management on a complaint log. The complaint log shall include the following information: resident's name, resident's address, the date of the complaint, the nature or details of the complaint, the steps taken to resolve the complaint (including any adjustments or work orders made, if applicable) and the date of resolution of the complaint. Authority regulations require Property Manager to retain records for three (3) years after the date the complaint is resolved.

1.2. RealPage shall maintain a complaint log which shall include the same information: resident's name, resident's address, date complaint was made, nature/details of complaint, steps taken to resolve complaint (including any adjustments or work orders made if applicable), and the date of resolution of the complaint. RealPage shall retain records for three (3) years after the date the complaint is resolved.

1.3. Property Manager shall coordinate the Authority's review of the complaint log. If RealPage receives a request from the Authority to review these complaint records, the Client Relations Manager shall notify Property Manager and Property Manager shall coordinate arrangements for the Authority's review.

2. Property Manager shall maintain a copy of each water bill received from Aquarion for a six-year period from the date of receipt.

3. Property Manager shall maintain records showing for each unit at The August at Steelpointe Harbor each month, the amount of water consumed by the residents of that unit and the amount of the bill for that consumption. RealPage shall generate this information each month and such information will be available to Property Manager for review online. Property Manager shall maintain these records and the corresponding Aquarion bill for six (6) years. Note: RealPage maintains twelve (12) months of PDF billing documents of actual invoices and seven (7) years of billing data that can be pulled into a report format.

4. Property Manager shall coordinate any requests from the Authority to review its billing records.

RESIDENT INQUIRIES REGARDING WATER SERVICE ISSUES

1. Residents should report any leaks or other physical malfunctions to Property Manager during regular business hours as well as outside of regular business hours.

1.1. If a Resident reports a leak or other loss of service, Property Manager will generate a work order for the maintenance staff for resolution. The work order must state the date of the report, name and address of resident making the report, and the nature of the problem.

1.2. The maintenance staff will record the investigation undertaken and the results of that investigation on the work order processing system.

1.3. Upon completion of the investigation or repair, the maintenance staff will record the results on the work order, leave a copy of the work order with the Resident and provide a copy to Property Manager. Property Manager shall maintain record of the work order

and resolution for at least three (3) years from that date.

2. Resident should first contact Property Manager for any inquiries concerning water volume, taste, odor, or other water quality issues. Property Manager shall contact the water provider, Aquarion, on the Resident's behalf.

2.1. If a Resident has concerns over water quality issues, advise the Resident that you will first contact Aquarion on their behalf to address such problem, and that you will relay the outcome to them. Please contact Aquarion at 203-445- 7310 or 800-732-9678 to directly address any problems with water volume, taste, odor, or other quality control issues. Advise Residents that if they are unable to contact you in an emergency, or if they are dissatisfied with your response to a problem, they may call Aquarion directly. Under certain circumstances, Aquarion may bill the property, and the property shall be responsible for a service call charge for responding to a call from a Resident.

2.2. Advise the Resident that at any time the Resident is free to present his/her concern regarding water volume, taste, odor, or other quality control issues directly to the Department of Public Health, Water Supply (" DPH") at 410 Capitol Avenue, Hartford, CT 06134, 860-509-7333. The DPH, rather than the Authority, regulates issues concerning water volume, taste, odor, and other quality control issues.

2.3. Advise the Resident that if they are not satisfied with your response and/or the response of Aquarion**,** they should contact the DPH and advise Property Manager. Property Manager should advise RealPage.

SUBMETER TESTING, INSPECTION, AND MAINTENANCE

1. In accordance with Section 16-11-89 of the Authority's Regulations, the following procedures will apply to requests for submeter testing.

1.1. Requests for a test of the submeter should be in writing and referred to Property Manager. Within one (1) week of receiving the written request for a test, Property Manager shall notify Resident in writing that the Resident or an authorized representative has the right to be present at the test. Resident must respond within ten (10) days to arrange to be present at the test.

1.2. Upon receipt of such notification, Property Manager shall contact the RealPage Customer Relations Manager to arrange for an independent third-party vendor to visit the property to conduct a meter test at a time that is convenient to both the Resident, his or her authorized representative, and the technician, as soon as possible.

1.3. Residents will not be charged for a test if the submeter has not been tested within the twelve-month period prior to the request and if the Resident agrees to abide by the results of the test as the basis for adjustment of any disputed charges. Otherwise, Property Manager reserves the right to charge Resident forthe test.

1.4. An Independent Third-Party Vendor who specializes in meter testing will perform the field calibration test at the apartment home.

1.5. If that test shows that the submeter is not accurately measuring water usage, the technician will replace the submeter and Property Manager shall work with the Resident to adjust the water bill.

1.6. If that test shows that the submeter is accurately measuring water usage, and the Resident disagrees with the accuracy of the test, then at the direction of Property Manager, the technician will replace the submeter and send the original submeter to the following testing facility for a bench test:

ZENNER PERFORMANCE
15280 Addison Rd. Suite 340
Addison, Texas 75001
Phone: (972) 386-6611
FAX: (972) 386-1814

Property Manager will be responsible for all associated costs.

1.7. The Property Manager will receive a copy of the results from the bench test. Property Manager shall then contact the Resident with the results. If the results show that the submeter was not accurately measuring water usage, Property Manager will work with the Resident to adjust the bill.

2. Property Manager shall provide a copy of the written report of the results to the Resident.

3. Property Manager shall keep a record of all communications regarding a request for a test of the submeter, including but not limited to the results of the testing, for a period of at least three (3) years from the date of the report.

4. Additionally, Section 16-259 of the General Statutes provides that upon request by a tenant to the Authority, and payment by the Resident of a ten-dollar ($10) fee to the Authority, the Authority may direct Property Manager to inspect the water meter.

4.1. If the Authority directs Property Manager to inspect the water meter, Property Manager shall follow the same procedures outlined above. Property Manager shall provide a written report of the results to the Resident and the Authority.

4.2. If the meter is found not to register accurately within a limit of variation prescribed by the Authority for that type of meter, Property Manager is obligated to reimburse the Resident the ten-dollar ($10) fee paid to the Authority and to replace the submeter at no cost to the Resident. Additionally, the submeter shall not be used again until the problem causing the deviation is corrected and the Authority approves the use of that submeter.

5. Property Manager and RealPage will work together to perform submeter maintenance as required by the manufacturer's specifications. When submeter maintenance is required, Property Manager shall provide notice to the Resident utilizing the forms given.

6. Property Manager shall be responsible for maintaining the submeter in accordance with manufacturer specifications.

7. Property Manager shall permanently keep all records concerning submeter maintenance.

RESIDENT REQUESTS FOR METER READS OR METER EXAMINATION

1. Property Manager is not responsible for and does not read the submeter or otherwise monitor water consumption in an apartment home.

    1.1. The submeter system is computerized. An on-site data collection device records the amount of water used in your apartment home daily. RealPage will remotely read each unit's submeter daily 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 and generate and mail a bill to each apartment home. 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 in Richardson, Texas.

    1.2. If there is a technical problem obtaining a read through the remote reading equipment, RealPage will generate 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 the Resident. Where such data is not available, the estimated bill will be based on a 2,100 gallon/month usage. The bill will be clearly identified as an "estimated bill."

2. If a Resident asks Property Manager for a read of the submeter, Property Manager should contact RealPage by the end of the next business day, request a reading from the RealPage and promptly convey that reading to the Resident.

3. If a Resident asks to examine his/her submeter, Property Manager should explain that the Resident can access the submeter by accessing the utility closet. Property Manager should arrange a time and date for examination if the Resident needs assistance with accessing the submeter. If a Resident asks to have his/her submeter tested or inspected, implement the procedure set forth in the Section labeled "Submeter Testing and Inspection."

RESIDENT INQUIRY AND COMPLAINT HANDLING PROCEDURES

1. Property Manager to advise the Resident that they are free to present their concerns regarding their bill or the submetering process in general, directly to the Authority at Ten Franklin Square, New Britain CT 06051. They may also call toll free Consumer Assistance at 1-800-382-4586; TDD 860-827-2837; facsimile 860-827-2613; website: www.state.ct.us/dpuc; but **ask the Resident for an opportunity to work with them to resolve the problem.**

2. Direct the Resident first to RealPage, at 1-800-590-7355, Monday through Friday, 7 a.m. to 7 p.m. Central Standard Time, Saturday, 9 a.m. to 6 p.m. Central Standard Time.

3. Advise the Resident that if they are not satisfied with the response from RealPage, they should contact Property Manager again.

    3.1. If you are contacted by a Resident who reports that he/she is not satisfied with the

response from RealPage, you should do the following:

3.1.1. Ask the Resident for an opportunity to work with them to resolve the problem.

3.1.2. Conduct an initial investigation of the complaint by the end of the next business day.

3.1.3. Take whatever steps you deem necessary to address the issue promptly. If you need additional assistance or guidance to resolve the issue, contact your RealPage Client Relations Manager.

3.1.4. Keep in contact with the Resident to assure that the Resident is aware of what you are doing to resolve the issue.

ABNORMAL USAGE REPORT

1. At the time that it generates the monthly bill, RealPage will generate a report of water consumption for each apartment home for that month which will be available to Property Manager for review online. If you have any questions about how to interpret the information, contact RealPage.

2. RealPage will notify Property Manager if water consumption for any residential accounts reflects abnormally high usage based on the Resident's actual historical usage. If no prior usage history exists, the threshold used to determine abnormally high consumption is 30% greater than the national daily household average.

3. Property Manager should promptly review the abnormal consumption report. Since abnormally high consumption *may* indicate a leak or a mechanical problem with the submeter, Property Manager should investigate all abnormally high consumption situations to determine if a repair is required.

4. If the abnormally high consumption is because of a leak or other problem that requires a repair, Property Manager should provide the Resident with the work order for that repair.

PAYMENT DUE DATE, LATE FEES, COLLECTION PROCESS, TERMINATION OF SERVICE, ADJUSTMENT OF WATER BILLS

1. RealPage will directly bill the Resident monthly.

2. The bill will state both the payment due date and the mailing date. A payment is past due, and the account will be identified as delinquent if payment is not received by the payment due date which, by regulation, must be no less than 33 calendar days after the mailing date.

3. Property Manager will access the RealPage website for data regarding account payment status on a regular basis to identify delinquent accounts. Property Manager will be responsible for initiating procedures to collect delinquent amounts.

4. Under no circumstances will water service be terminated due to non-payment and under no circumstances is Property Manager to make any statement to that effect to any Resident.

5. Collection of past due amounts on delinquent accounts will be the responsibility of Property Manager.

    5.1. Collection efforts will include sending a letter to the Resident if payment has not been received by the 35th calendar day after the mailing date for a bill and sending a subsequent letter to the Resident if payment has not been received by the 91st calendar day after the mailing date of a bill.

    5.2. Property Manager shall maintain a written log of contacts with Residents regarding delinquent accounts.

    5.3. Property Manager shall determine at what point an attorney or a collection agency should be involved for resolution.

6. If at the time the Resident moves out, the Resident has an outstanding balance for water service, that amount may be deducted from the security deposit in accordance with the terms of the lease.

7. To assure accurate billing, Property Manager should promptly notify RealPage as to Resident move-in and move-out dates.

8. A Resident who receives a water bill that he or she thinks is incorrect may request that the bill be adjusted. All requests for adjustments of water bills are to be promptly referred to the Property Manager who shall work with the Resident to resolve the issue.

ANNUAL REMINDER

1. The Authority requires that each Resident receive a notice stating that the Authority has jurisdiction over submetering activities at Greenwich Landing Apartments at the time of lease renewal. Property Manager should remind residents they may contact the Authority with complaints or concerns regarding submetering at any time. Property Manager will assure that each Resident at lease renewal receives a copy of the notice.