STATE OF CONNECTICUT
PUBLIC UTILITIES REGULATORY AUTHORITY

Water Submetering Application Form

The following is the Application for Approval to Install and Use a Water Submetering System (Application). Filing instructions are included below. The Public Utilities Regulatory Authority (Authority or PURA) requires all filings to be submitted electronically.

When filing the Application, the following must be provided:

- Electronic Filing: one (1) copy of the Application, including all Exhibits, Affidavits, and any attachments.

Not more than 30 days after the Application is filed, the Authority will notify the Applicant whether the Application is complete and accepted, or whether the Applicant must submit additional information. The Authority will make reasonable efforts to issue its Decision regarding the Application no later than 90 days after the Application is accepted and deemed complete. **In no event shall failure of the Authority to act in such period be deemed an automatic approval of the application.**

If you need assistance, please contact the Authority's Office of Education, Outreach, and Enforcement (EOE) via:

- Toll Free Number (In Connecticut): 1-800-382-4586
- Toll Number Outside of Connecticut: 1-860-827-2622
- Email: pura.information@ct.gov
  - RE: Attn Water Submetering Application

Enclosed:
Filing Instructions
Application

FILING INSTRUCTIONS – WATER SUBMETERING APPLICATION FORM

I. **ELECTRONIC FILING**. The preferred method is filing from our website: http://www.dpuc.state.ct.us/ElectronicFiling/RevDPUCElectronicFiling.nsf/Start%20Area?OpenForm. Advance online registration is required (click on the link above, then Initial Registration.) Alternatively, e-mail the files to Pura.executivesecretary@ct.gov, or submit a USB flash drive with your documents in Microsoft Word or PDF format with your company name and filing date.

II. **WHAT TO FILE**. Submit one electronic copy of the Application, Exhibits, Affidavits, and any other attachments. All attachments, including Exhibits and Affidavits, should be clearly identified. All pages should be numbered and attached in sequential order, except for material for which protected treatment is sought (see below).

III. **PROTECTED MATERIAL**. Submit copies of protected material to Jeffrey R. Gaudiosi, Esq., Executive Secretary, Public Utilities Regulatory Authority via email at Pura.executivesecretary@ct.gov. Include in the email a motion for protective order, a proposed protective order, and an affidavit. The same motion, proposed order, and affidavit should also be filed separately in the docket. Please do not file the confidential material electronically in the docket. Many examples of these documents can be found on our website under Docket Databases - Active Docket Database by searching for "protective order."

IV. **QUESTIONS.** Questions regarding filing procedures should be directed to Jeffrey R. Gaudiosi, Esq., Executive Secretary, at (860) 827-2679 or Pura.executivesecretary@ct.gov.

V. **GOVERNING LAW.** Entities providing water submetering service are required to comply with Sections 16-11-55; 16-11-67 (1), (2) and (3); 16-11-69; 16-11-71; 16-11-77; 16-11-78; 16-11-88; and 16-11-89 of the Regulations of Connecticut State Agencies.

State of Connecticut
Public Utilities Regulatory Authority
10 Franklin Square
New Britain, CT 06051
Phone: (860) 827-1553; Main Fax: (860) 827-2613
https://portal.ct.gov/pura

APPLICATION FOR APPROVAL TO INSTALL AND USE A WATER SUBMETERING SYSTEM

Note: Where necessary, the responses to questions in the Application may be made on attached sheets, provided that each sheet and each response is clearly labeled and the pages are sequentially numbered.

****Name of water utility that will be servicing the property: Connecticut Water Company**

A. APPLICANT INFORMATION

The term "Applicant" refers to the owner, agent, lessor, or manager, as appropriate, at which the submetering system will be installed. The Applicant is the responsible party for all aspects of the submetering installation, consumer protections, and any Vendor hired to process billing, tenant notices, and/or other documentation.

Applicants have an ongoing obligation to amend and/or supplement the information contained in this Application, including the substitution of Vendors and any changes to Applicant or Vendor procedures or policies. In the event of a Vendor substitution, Applicants should provide PURA written notice within ten (10) days of such a change.

(A-1) APPLICANT'S LEGAL NAME, ADDRESS, AND WEB SITE:

Name: SP Residential I, LLC	
Address: 55 E. Main St.	*Main Telephone:* 317.816.9300
Address: Bridgeport, CT 06608	*Web site (if any):*

CONTACT PERSON/DESIGNATED REPRESENTATIVE FOR SERVICE AS TO THIS APPLICATION:

Name: Andy Keidel	*Title:* Owner's Representative
Company: Flaherty and Collins Inc.	
Address: 1 Indiana Square, Suite 3000	
Address: Indianapolis, Indiana 46204	
Telephone: 317-816-9300	*Fax: n/a*
E-mail Address: akeidel@flco.com	

Applicant is the _____ lessor; _____ owner; ____X___manager of the property;
_____ other agent (explain below)

(A-2) If Applicant has office(s) in Connecticut, provide the following information regarding Applicant's principal Connecticut office:

Address: n/a

Telephone: *Fax:*

(A-3) Applicant's Federal Employer Identification Number (FEIN): 87-1920819

(A-4) Applicant's Connecticut Tax Identification Number: 100470376-000

(A-5) Applicant's legal form of ownership:

☐ Corporation
☒ LLC
☐ Cooperative
☐ Other: _____

(A-6) Applicant was formed or organized on 12 (month), in 2021 (year), Delaware (state)

As used in this Application, the term "Vendor" means a third party retained by or on behalf of the Applicant to provide meter reading and/or billing services at the Facility on behalf of the Applicant. For purposes of this Application, each such Vendor is deemed a co-applicant.

(A-7) Vendor's legal name, address and web site:

Name: RealPage Utility Management, Inc.

Address: 2201 Lakeside Blvd., Richardson, TX 75082 *Main Telephone:* 877-325-7243

Web site (if any): www.realpage.com

VENDOR'S CONTACT PERSON/DESIGNATED REPRESENTATIVE FOR SERVICE AS TO THIS APPLICATION:

Name: Jeffrey Peterson *Title:* Vice President, Legal Counsel

Address: 2201 Lakeside Blvd., Richardson, TX 75082

Telephone: 972-810-2433 *Fax:*

E-mail Address: Jeffrey.peterson@realpage.com

(A-8) If the Vendor has office(s) in Connecticut, provide the following information regarding the Vendor's principal Connecticut office:

Address:n/a

Telephone: *Fax:*

(A-9) Vendor's Federal Employer Identification Number (FEIN): 33-0782615

(A-10) Vendor's Connecticut Tax Identification Number: 9707217

(A-11) Vendor's legal form of ownership:

☒ Corporation
☐ LLC
☐ Cooperative
☐ Other: _____

(A-12) Vendor was formed or organized on 12/04 (month), 1997 (year) in Delaware (state),

(A-13) Is Applicant currently under investigation, or has Applicant ever been fined, sanctioned, or penalized, in any state for violation of any consumer protection law or regulation?

☐ Yes. If yes, provide **Exhibit A-13: "Violation of Consumer Protection Law."** For each current investigation, provide all of the following: name of the state and agency conducting the investigation; date on which investigation began; description of the nature of the alleged violation; and status of the investigation. For each fine, sanction, or penalty, provide all of the following: date of the fine, sanction, or penalty; name of state and agency imposing the fine, sanction, or penalty; description of the violation; description of the fine, sanction, or penalty, including monetary amounts, if applicable; and copy of the order imposing the fine, sanction, or penalty.

☒ No

(A-14) Is Vendor currently under investigation, or has Submetering Contractor ever been fined, sanctioned, or penalized, in any state for violation of any consumer protection law or regulation?

☐ Yes. If yes, provide **Exhibit A-14: "Violation of Consumer Protection Law."** For each current investigation, provide all of the following: name of the state and agency conducting the investigation; date on which investigation began; description of the nature of the alleged violation; and status of the investigation. For each fine, sanction, or penalty, provide all of the following: date of the fine, sanction, or penalty; name of state and agency imposing the fine, sanction, or penalty; description of the violation; description of the fine, sanction, or penalty, including monetary amounts, if applicable; and copy of the order imposing the fine, sanction, or penalty.

☒ No

(A-15) Describe the Vendor's experience with submetering, the size and scope of its operations, and any other information that would be helpful in assisting the Authority to determine whether the Vendor has the capability to provide submetering services.

RealPage has been in business since 1997. The corporate office is in Richardson, Texas. Satellite offices are in Lombard, Illinois, Tampa, Florida and Irvine, California. There are over 20 direct hire technicians across the United States, within two hours of every major city providing new installations and service to over 2 million multifamily units.

For purposes of the remaining sections of this Application, the term "Applicant" is deemed to include the Vendor listed above where and as applicable.

B. FACILITY TO BE SUBMETERED AND TECHNICAL ASPECTS OF THE SUBMETERING SYSTEM

(B-1) Provide the following information regarding the multi-unit facility (hereinafter the "Facility") at which the submetering system is to be installed and operated:

Name of Facility (if applicable): **The August at Steelpointe Harbor Apartments**

Number of buildings in the Facility: 1

For each building in the Facility provide:

a. The Applicant's designation of the building (e.g., "Building A").
   n/a
b. The street address of the building.
   The August at Steelpointe Harbor
   55 East Main Street Bridgeport, CT 06608

c. The mailing address of the building.
   SP Residential I LLC
   211 N. Pennsylvania Street, Suite 3000 Indianapolis, IN 46204

d. The number of floors in that building and the number of units on each floor.
   6 Floors in total
   Flr1 = 84 Units
   Flr2 = 96 Units
   Flr3 = 120 units
   Flr4 = 120 units
   Flr 5 = 0 Units
   Flr 6 = 0 Units

e. The number of units in that building. **420 total units**

f. The number of submetered units in that building. **420 total units**

g. Attach as **Exhibit B-1** a floor plan of each building. If there are non-residential units (e.g. a doctor's office) in the Facility, such units should be identified on the floor plan.

   See Exhibit B-1

h. If the building is new construction or a pre-existing building. **New Construction**

If there are non-residential units located in the Facility, will any such units be submetered?

☐ Yes
☒ No
☐ Not Applicable

If the submetering system has not yet been installed, state the date on which installation of the submetering system is anticipated to begin. **As soon as Final Order issued.**

(B-2) Will common areas be separately metered?

☐ Yes

☒ No. If No, describe how the Applicant will ensure residents will not be charged for water used in the common areas or in any other part of the premises that is not within the exclusive control of the resident.
Applicant is responsible for, and will pay, the entire water invoice for the property. Applicant will recovery the cost of water consumed by the residents though the submetered usage. Residents are only charged for the submetered usage in their units.

(B-3) As **Exhibit B-3**, provide a complete set of a schematic rendering of metering plans for the Facility, clearly identifying:**(1) the master meter(s), (2) metered common areas, and (3) units that Applicant proposes to submeter.**

The schematic must clearly indicate what each meter is measuring.

The purpose of this rendering to verify that each proposed submeter will measure only the water used exclusively by the tenant's unit and will not measure water supplied to common areas or any other portion of the property behind the water company's master meter. PURA will NOT perform an engineering review of the submitted renderings/plans for compliance with plumbing and water engineering codes and safety standards. The Applicant remains responsible for obtaining review and approval for any applicable engineering and safety standards as required by state and municipal laws, building codes, or other relevant regulations.

(B-4) Identify the make, size, and model number of the submeters that will be used in the submetering system and provide information that shows that the submeters have been certified as meeting the minimum standards established by the American Water Works Association for this type of meter.

SunSonic, LLC
Digital Electronic Ultrasonic Water Meter
Model: UMeters – C(Clamp-on-Pipe)
Sizes: ¾", 1"
See Exhibit B-4 (Certificate of Conformance)

(B-5) Provide the following regarding the plumber who installed (or will install) the submeters:
Measuring device is a clamp-on meter which does not require plumbing work or pipes to be cut for installation. See information above B-4
Name:
Company Name:
Address: *Telephone:*
CT Plumber's License #:

C. COMPLIANCE WITH REGULATORY REQUIREMENTS GENERALLY

(C-1) As to Section 16-11-55 and 16-11-69 of the Regulations:

a. State the name of the water utility supplying water to the Facility.
Aquarion Water Co

b. Provide a sample bill as **Exhibit C-1b(1)** showing how tenants will be billed for consumption. If estimated bills will be used, explain why and provide a copy of the estimated bill as **Exhibit C-1b(2)**.

See Exhibit C-1b(1) and C-1b(2)
The reasons for estimated bills include (1) submeter malfunctions and no reads are received or there are missing reads and (2) transmitter failure.

c. If the water utility bills the Applicant on a quarterly basis and tenants are billed on a monthly basis, state how the tenant's monthly consumption is determined and describe the mechanism for truing up or reconciling the tenant's charges. **Not Applicable**

(C-2) As to Sections 16-11-67(1)-(3) of the Regulations:

a. 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.

See Exhibit C-2a

b. Provide as **Exhibit C-2b** a copy of the Applicant's procedures for notifying tenants of changes in rates or rate classification for water service provided to the Facility by the water utility, including copies of any notices or other written material that will be used to notify the tenant of any such changes.

See Exhibit C-2b

(C-3) As to Section 16-11-71 of the Regulations:

a. Provide as **Exhibit C-3** a copy of the Applicant's written procedures implemented to ensure compliance with Section 16-11-71 of the Regulations (adjustments to bills).

See Exhibit C-3a (Adjustment to Bills)

(C-4) As to Section 16-11-77 of the Regulations:

a. Applicant understands and agrees to comply with 16-11-77 of the Regulations by making a prompt and complete investigation of all billing inquiries or complaints received and advise the customer thereof. Applicant shall keep a record of each such inquiry or complaint for a period of three years after the final resolution of the inquiry or complaint and shall show the name and address of the customer, the date and nature of the inquiry or complaint, and the adjustment or disposition thereof.

☒ Yes

(C-5) As to Section 16-11-78 of the Regulations:

a. Applicant agrees that any employee of the Applicant or Vendor whose duties require entry of the customer's premises shall wear a distinguishing uniform identifying them as an employee of the Applicant or Vendor, or carry a badge or other identification prominently displayed, which will identify them as an employee of the Applicant or Vendor.

☒ Yes

(C-6) As to Section 16-11-88 and 16-11-89 of the Regulations:

a. Applicant agrees that Applicant will comply with Sections 16-11-88 and 16-11-89 of the Regulations (periodic and routine tests (Section 16-11-88) and testing the accuracy of a submeter upon a tenant's request (Section 16-11-89)).

☒ Yes

b. Describe the testing procedure that will be used to test the accuracy of the water meter pursuant to Sections 16-11-88 and 16-11-89 of the Regulations in **Exhibit C-6b(1)**. If a "certified test bench" will not be utilized, provide as **Exhibit C-6b(2)** water industry literature or an affidavit from an appropriately qualified and licensed engineer to support that the test procedure used conforms with prudent utility practice. As **Exhibit C-6b(3)** provide written material regarding the test procedure that will be given to the tenant.

See Exhibit C-6b(1) – Testing Procedure
See Exhibit C-6b(2) – Water Industry Literature
See Exhibit C-6b(3) – Materials provided to tenant

D. COMPLIANCE WITH REGULATORY REQUIREMENTS REGARDING CUSTOMER SERVICE AND COMPLAINT HANDLING

(D-1) Provide as **Exhibit D-1** a copy of the Applicant's customer service procedures with respect to:

a. Notification to tenants as to how to contact the Applicant with respect to concerns, issues, or complaints as to submetering, including but not limited to billing for water service and testing the accuracy of the submeter upon the tenant's request;

b. Notification to tenants stating, that all questions regarding pressure, volume, taste, odor, or other water quality issues should be directed first to the landlord. The notice should include, in bold type, the landlord contact information for normal business hours and after-hours. In addition, the notice should instruct tenants to: (a) contact the local water utility if they are unable to reach the landlord in an emergency, or if they are dissatisfied with the landlord's response to a call, and (b) contact the Department of Public Health (DPH) if they are not satisfied with the response of the landlord or the local utility. The notice should include contact information for the local utility and DPH.[1]

c. Notification to tenants that submetering must be approved by the Authority and providing the tenant with information as to how to contact the Authority when they have complaints, issues, or concerns that they believe have not been adequately addressed by the Applicant pursuant to Section 16-11-55(4) of the Regulations.

See Exhibit D-1

(D-2) Describe the procedures for monitoring a tenant's consumption for the purpose of identifying abnormally high usage or other usage patterns that could reveal the existence of a leak affecting that tenant's monthly bills.

Vendor provides Applicant with a monthly billing preview for approval prior to sending statements to tenants. Vendor employs proprietary automated software for identifying abnormal usage. Applicant has access to these reports. Tenants are notified of every month's consumption on their monthly bill.

[1] Landlord's contact number should be listed first, then the water company.

(D-3) Provide as **Exhibit D-3** an itemization of all potential fees a tenant can be asked to pay with respect to submetering, including, but not limited to, any **late fee** and/or **service fee**. The itemization should describe the nature, amount, and frequency of the fee.

See Exhibit D-3 – Itemized list of potential fees for water submetering

E. ADDITIONAL INFORMATION

(E-1) Provide as **Exhibit E-1** a comment letter from the water utility confirming the water utility has reviewed the application. The letter must clearly state whether or not it opposes the Applicant's submetering proposal.

Comment Letter is in progress and will be submitted when received from water provider.

(E-2) Provide as **Exhibit E-2** the portion of the lease agreement with the tenant that explains the tenant will be liable for fees with respect to water submetering including, but not limited to, any late fee and/or service fee described in D-3 above.

See Exhibit E-2 – Lease and Utility Addendum

(E-3) Applicant agrees that they cannot terminate a tenant's water service for any reason.

☒ Yes

(E-4) The Applicant understands it must notify the residents of the facility that the Applicant has applied to the Authority for permission to submeter, and include the following information: (1) that the Applicant has submitted an application to the Authority for approval to submeter water service in the facility; (2) the docket number of the proceeding in which the Authority will review the application; (3) that if the resident has any concerns or objections about the Applicant's proposal to submeter, he or she may submit written comments, referencing the docket number, to the Authority via the Executive Secretary at email Pura.executivesecretary@ct.gov. Please confirm the Applicant provided such notice by checking the box below.

☒ Yes

(E-5) Applicant agrees that in the event they plan to cease submetering, they will file correspondence in the docket in which their application was approved describing how they intend to accomplish the transition away from submetering. Such filing shall include how and when they will notify their tenants of the change.

☒ Yes

(E-6) Explain, in a brief narrative, why the proposed submetering at the facility is necessary instead of installing separate meters for each unit.

Water submetering is a cost-effective way during new construction and yet provides each tenant to be responsible for their own water usage. Residents pay for their personal usage only, thus providing utility awareness and an incentive to conserve. This allows property owners to keep the cost of rent reasonable and fair to all.

F. ACKNOWLEDGEMENT OF THE AUTHORITY'S JURISDICTION

(F-1) By seeking to submeter and perform the responsibilities ordinarily performed by a regulated water company with respect to metering, billing, and customer service, the Applicant and all Co-Applicant(s) agree that they will be subject to the Authority's jurisdiction with respect to their submetering activities in the same manner as a regulated water company, including but not limited to the Authority's ability to revoke submetering approvals, order the immediate cessation of submetering pursuant to Section 16-11-55(4) of the Regulations of Connecticut State Agencies, and/or impose fines pursuant to General Statutes Section 16-41.

☒ Yes

G. CHANGES IN PROPERTY CONTROL OR VENDOR RELATIONSHIP

(G-1) Applicant agrees that if there is a change in the landlord, owner, manager, or Vendor for the property at which the submetering system is installed changes, **the Applicant will notify all of the parties listed above that the Application needs to be updated with the new information**. The Authority requires submission of clean and redlined/tracked changes versions of the updated application; new exhibits, affidavits, or attachments, if applicable; and a statement of all previous docket numbers in which the Authority reviewed the system. If a proposal for significant technical upgrades to the system is concurrent with a change in property control or vendor relationship, a new application should be submitted rather than an updated application.

☒ Yes

APPLICATION AFFIDAVIT

"Veracity of Statements"

State of IN :

: Indianapolis ss.
(Town)

County of Marion :

Robert Flaherty, Affiant, being duly sworn/affirmed according to law, deposes and says that:

He/she is the Manager (Office of Affiant) of SP Residential I, LLC (Name of Applicant);

That he/she is authorized to and does make this affidavit for said Applicant;

That SP Residential I, LLC, the Applicant herein, certifies under penalty of false statement that all statements made in the application for approval to submeter are true and complete and that it will also amend its application while the application is pending if any substantial changes occur regarding the information provided in the application within ten (10) days of any such change.

That the facts above set forth are true and correct to the best of his/her knowledge, information, and belief and that he/she expects said Applicant to be able to prove the same at any hearing hereof.

Signature of Affiant

Sworn and subscribed before me this 20th day of May (Month), 2026 (Year).

Signature of official administering oath

Cary N. Lee
Print Name and Title

My commission expires 9/26/2032.

Cary N. Lee
Notary Public, State of Indiana
Hendricks County
Commission Number NP0759068
My Commission Expires
09/26/2032
SEAL