

**Application and Plan for the Residential Submetering
of George T. Douris Tower
a Master-Metered Rental Building
in Queens New York**

**Submitted to:
Jaclyn A. Brillig
Secretary
New York State Department of Public Service**

**Submitted by:
HANAC Astoria Housing Redevelopment Associates, L.P.**

John P. Kaiteris, Executive Director

With consultation and assistance
from

Jack V. Woolams
Energy Investment Systems, Inc.

Date: April 8, 2010

Introduction

HANAC Astoria Housing Redevelopment Associates, L.P.

The subject property of this application is the GEORGE T. DOURIS TOWER, a 184 unit affordable housing apartment complex for seniors located at 27-40 Hoyt Avenue South (a/k/a 25-03 29th Street, a/k/a/ 28-31 Astoria Boulevard) Queens, New York.

The George T. Douris Tower also known as Astoria Senior Housing is located at 27-40 Hoyt Avenue South in the Astoria section of Queens and is owned by HANAC Astoria Housing Redevelopment Associates, L.P. (HANAC AHRA) The building was constructed through the Low Income Affordable Marketplace Program (LAMP) of the New York City Housing Development Corporation (HDC), the Special Needs Division of New York City Department of Housing Preservation and Development (HPD) and the New York State Division of Housing and Community Renewal (DHCR).

This submetering plan and application was prepared with the assistance of Energy Investment Systems, Inc. (EIS), an energy services firm with a specialty in submetering and regulatory compliance. This application conforms to the Residential Submetering regulation 96.2 (b) of the Public Service Law. Section (b) pertains to “Master Metered residential rental units owned or operated by private or government entities.”

The GEORGE T. DOURIS TOWER is a 15 story building with a basement level below grade. It has on-site laundry, exercise room, game room, conference rooms, classrooms, community space, gardens, and parking areas. The 43,824 sq. ft. former municipal parking lot has been developed into a 173,943 sq. ft. housing apartment complex. A dinning hall is available for residents in the contiguous senior center open to the general public. There is a roof-top garden above the first and fourteenth floor.¹

The property is being occupied by low and moderate income residents and regulated by the New York City Housing Development Corporation (HDC). The Project is owned by HANAC Astoria Housing Redevelopment Associates, L.P. (a/k/a HANAC, a/k/a/ HANAC AHRA). A submetering system has been installed at the building but will not be used for billing until the proposed submetering plan is approved by the Commission. The regulated rents charged to tenants do not include an allowance to HANAC AHRA for electricity. As provided in the leases, tenants will be billed for electricity after approval of the submetering plan by the NYS Public Service Commission. As of April 1, 2010 97 apartments are rented, full rent up to a total of 183 apartments is expected by the end of April.

By regulatory agreement, the NYC Housing Development Corporation supervises the setting of rents in accordance with formulas applied to tenants’ income to assure the affordability of the units. As the rents do not include the cost to HANAC AHRA of providing electricity to the tenants, the rents do not include the utility allowance and are lower by that amount than they would be if rents included in apartment electricity usage.

¹ Description provided by the Association for Energy Affordability, the NYSERDA Multifamily Performance Program Partner for the participation of HANAC AHRA in the New Construction Program.

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The Submeters were installed by Velocity Utility Billing (A Division of Real Page) under contract with HANAC AHRA and submetering billing will be administered by HANAC AHRA and its Managing Agent with technical support provided by Velocity Utility Billing. The meters meet industry product and accuracy standards required by the Commission for the approval of residential submetering plans. Technical support for the TRIACTA metering equipment will be provided by the Installer, Velocity.

Construction of GEORGE T. DOURIS TOWER complied with and was assisted by the NYSEDA Multifamily Performance Program (MPP). As such it was designed and built to maximize energy efficiency. This reduces overall operating costs of the building improving its viability and affordability to lower income residents. It also minimizes costs for electricity usage in apartments. According to the project design and construction as approved by NYSEDA, the in apartment electricity costs should be within the electricity allowances provided by the facility's rent regulating agency, the NYC Housing Development Corporation.

Space Heat and domestic hot water for the apartments in the building are provided centrally from high efficiency gas fired boilers. This service is included in the leasehold, is not electrical and will not be submetered to the tenants. Energy Efficient equipment in the apartments includes: Energy Star refrigerators, Energy Star air conditioners, Energy Star light fixtures and Energy Star bathroom fans with humidistat controls. Electric use in apartments is also minimized by location of washing machines in common area laundry rooms. Common area dining facilities and recreational facilities also reduce the need for in apartment electricity usage.

The submetering of the apartments would be mutually beneficial to the not for profit owner and tenants. The owner of the building is committed to the long-term economic stability of the property. By submetering, HANAC AHRA would be able to offset an escalating cost and shift responsibility to the resident end-users. This would help stabilize rents in the long term. Tenants would receive an opportunity to save that did not exist before. When residents begin to pay their own electric bills, they will recognize electricity as the precious resource that it is rather than the free commodity it is perceived to be. This will facilitate more judicious use of electricity.

Submetering apartments will encourage individual responsibility and offer direct incentives for residents to reduce usage and lower their costs. Studies prove that submetering of master-metered buildings results in building cost-savings of 10-25%. In addition, submetered master-metered buildings can manage peak demand, which can result in additional savings for both common areas and tenants.

The balance of this petition addresses the eight requisite areas of the NYS PSC Residential Submetering regulation 96.2 (b).

(1) a statement substantiating the economic advantages of submetering over direct utility metering

Direct-metered service is significantly more expensive than submetered service.

First, converting to direct metered service would require very expensive modifications to the building main electricity service equipment and the installation of banks of form 12S sockets to accept Con Edison network meters in a three phase service. This work typically costs in excess of \$100,000 for a building this size.

Moreover, submetered master-meter service typically results in 15-30% savings over direct-metered service. This was borne out in a recent EIS analysis of a submetered cooperative apartment building that EIS assist with converting from direct metered service. EIS analysis revealed savings of 26% over direct- metered costs. Savings are due to several factors. Direct-metered customer service charges are higher, about \$15 per account before consumption charges are added. The Market Supply Charge for SC-1 direct-metered accounts is structurally higher than that for an SC-8 master-metered account: “multiple dwelling redistribution customers.” Delivery charges for SC-1 accounts are generally higher. Even when demand charges are included under SC -8, master-metered apartment buildings pay considerably less than direct metered units. In this interest the owner wants to preserve these lower costs for the tenants.

Master-metered customers are also able to benefit directly from New York State’s deregulated electricity market, as instituted through PSC retail competition orders. Master-metered buildings can take advantage of low bulk purchasing rates through full-service Con Edison accounts. As larger customers, they are also more attractive to the new generation of alternative electricity providers (ESCOs). Typically Con Edison SC-8 customers purchase electricity service from ESCOs in the State’s unregulated electricity market at several times the rate that SC-1 customers receive service from alternative providers.

(2) a description of the type of submetering system to be installed and a validation of its reliability and accuracy

This project recognizes that the core of any submeter billing system is the ability to verify its accuracy. This cannot be compromised. The system installed possesses technology that offers efficiency, accuracy and reliability that has been documented by laboratory testing. Each meter is properly calibrated before sale to assure accuracy in use. The system was installed in strict accordance with manufacturer instructions to assure proper functioning.

The system installed at GEORGE T. DOURIS TOWER is a TRIACTA Power Hawk 6320. TRIACTA is a Canadian company. Canada has long been a leader in submetering technology. This meter has been tested and approved for use in California. Meter specifications are attached and together with a test report and reference standard that documents the accuracy and reliability of the equipment. This technology is superior in functionality, accuracy and durability as evidenced by the following documentation:

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- The PowerHawk 6320 System Overview:- attachment A:

This brochure describes the Metering system features and installation and provides product specifications. Stated measurement accuracy is +/- 0.5% well within ANSI accuracy standards.

 - It is a digital advanced metering system with Automated Meter Reading (AMR) capability to read, store and transmit electric data. When combined with computerized billing software, the data can be used to produce complete and accurate bills of usage, costs and amounts owed.
 - Hourly data can be used to establish usage patterns for the entire building and for individual customers as a tool in settling billing disputes.
- The Certificate of Approval for Weighing and Measuring Devices from the State of California – Attachment B. The Certificate illustrates and describes the tests this meter passed for operation, durability, and accuracy according to California State standards. The Certificate evidences that the meter complied with all applicable requirements of the California Division of Weights and Measures. This means that it complied with the Tolerance Values in Section T.4.1. of their Field Reference Manual. The acceptance tolerance in the manual is 1% which conforms to ANSI standards.
- Installation: The Meters were installed at the property in accordance with the TRIACTA detailed 21 page Installation Guide to assure proper operation. The installation record at the property identifies the specific apartment for each meter point for all 184 apartments. Each meter designated for an apartment measures electricity flowing through the power feeder cables to the dedicated electricity panel for that apartment.

(3) the method and basis for calculating rates to tenants

Submetered rates will be calculated to recover building costs for master-metered electricity service. The submetering system calculates usage in its simplest form, as an odometer logs automobile mileage: the number of kilowatt hours consumed by each unit during a billing period is computed by subtracting the final reading from the initial one. The monthly cost of building-wide electric service is divided by kilowatt hours consumed by the master meter to yield a flat monthly kilowatt hour rate. (Under full Con Edison service, the Con Ed master meter bill is simply divided by kilowatt hours consumed. Under ESCO service, the master meter cost includes a Con Edison delivery charge which is added to the ESCO charge for the commodity (the generated portion of electricity service) Since Con Edison is responsible for reading the master meter, the number of kilowatt hours consumed is identical for both the ESCO and Con Edison accounts.. The rate per unit of electricity service is then multiplied by submeter readings of consumption to yield individual charges. An administration fee is added to each resident's monthly bill. Charges to tenants shall not exceed the utility's tariffed residential rate for direct metered service to such tenants

(4) complaint procedures and tenant protections consistent with the Home Energy Fair Practices Act

Submetering administrative services will be provided by the [property manager] with technical support as needed by the submetering company or consultant. The submetering program administrator will seek technical support services in particular to resolve complaints regarding billing accuracy and billing services.

Submetering administrative services will be provided in ways to enable continuation of electricity services, minimize tenant complaints and to minimize account delinquencies and the need for account termination. Submetering services will follow the NYS PSC HEFPA Compliance Guide for Submeter Service Providers. More specifically in accordance with the Guide the following consumer protections and grievance procedures will be provided:

a) HEFPA protections that will be provided by the submeterer to all submetered customers:

The tenant's rights to basic electricity service will be protected at all times. Electricity service will not be interrupted or suspended while tenants are in occupancy unless allowed or ordered by the NYC PSC in accordance with HEFPA procedures. Electricity bills will not be treated as rent and there will be no evictions for non-payment of electricity bills. Submetering administrative procedures will be updated and supplemented to comply with evolving policies and procedures developed by the PSC. The following is a summary of the submeterer's HEFPA responsibilities as outlined in the PSC Compliance Guide.

1. Before discontinuation of service due to failure to pay bills, proper notice will be given to customers and opportunity to pay provided. Notification of HEFPA protections and complaint handling procedures will also be provided.
2. Special Procedures will be provided for customer with special needs and circumstances to facilitate continuation of services with payment of accounts. Special considerations will be given to customers with medical emergencies, electricity dependent life support systems, the elderly blind or disabled, or electricity dependent heating during cold months.
3. Third parties will be allowed receive account notices on behalf of the customer.
4. Payment plans will be offered to facilitate affordable payment of accounts, including deferred payment agreements, budget or levelized billing plans, and special quarterly billing plans.
5. Account deposits will be required and late charges imposed only in compliance with specific detailed HEFPA rules.
6. Electricity bills shall contain customer account information, meter readings, electricity usage and billed amount, account status, and payment requirements as specified in the HEFPA guidelines.
7. Prior to submetering and annually after submetered customers will be notified of their HEFPA rights and responsibilities.
8. Simple and effective complaint procedures will be provided and administered for the fair and efficient resolution of disputes, as described in the subsequent section.

9. The building manager will cooperate with any proceedings before the PSC initiated by tenants and comply with resulting decisions by the PSC.

Required PSC documents under HEFPA.

Attachment C contains [Home Energy Fair Practices Act \(HEFPA\)](#) compliant documents that will be utilized by the submeter administrator specifically for this project. The documents comply with the formats found at <http://www.dps.state.ny.us/hefpa.htm> developed by the NYS PSC as necessary for HEFPA compliance and recent cases. The Documents in Attachment C include:

- Checklist of procedures, forms and instructions
- Special Protections Registration Form
- Deferred Payment Agreement
- Asset Evaluation Form
- Budget Billing Form
- Reminder Notice
- Final Termination Notice
- Notice to Social Service of Customer Inability to Pay

b) Complaint Process

Complaint administrative procedures:

1. Filing and Responding to Complaints:

Customer questions or concerns regarding electric service are first to be presented to the owner/managing agent of the building by telephone or mail. A customer can contact the managing agent at:

Address: The Wavecrest Management Team, Ltd.
87-14 116th Street,
Richmond Hill, NY 11418,

Phone: 718-463-1200.

Primary Contact: Christina Harsch
e-mail: charsch@twmt.net

The managing agent will investigate and respond to the complaint in writing within ten days. The response will state the decision and supporting findings from the investigation.

The Managing Agent will be responsible for all account collections and will respond directly to tenant complaints about collection practices.

Where responding to the complaint requires the services of the submetering company or consultant, particularly to respond to complaints about billing accuracy, the submetering administrator will order investigations and respond to the tenant and building manager on behalf of the owner within 30 days.

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2. To appeal a decision:

Any aggrieved customer may appeal the submetering administrator's findings to the building manager supervisor who will offer the customer a hearing within 30 days of the appeal of the submetering administrator's findings. This appeal request can be made by telephone or mail and the findings and decision will be reported in writing to the customer. These proceedings will be consistent with the requirements of HEFPA.

3. Further review by the PSC:

At any time or after a submetered customer's concerns have been appealed to a supervisor/manager, within the owner/managing agent's office, if the customer's concerns are still not resolved in whole or in part the customer may contact the Public Service Commission at New York State Department of Public Service, 3 Empire State Plaza, Albany, New York 12223 or at 90 Church Street, New York, New York 10007 or call its HELPLINE at 1-800-342-3377 and file a complaint seeking to have the issue resolved by the Public Service Commission. The website for the Public Service Commission is www.dps.state.ny.us.

4. Contacting the PSC:

The complaint administrative procedures supplement rather than supplant remedies available to customers from the Public Service Commission at New York State Department of Public Service (PSC). The customer may contact the PSC at any time at the above address or phone number with any questions or concerns. The PSC may intervene at anytime in the complaint administrative process that it deems necessary to fulfill HEFDPA protections for an aggrieved customer.

If the complaint is in regard to a billing issue, the customer will not be asked to pay the disputed portion of the bill while the matter is being investigated by the owner/managing agent or the Public Service Commission. However, the remaining balance of the bill in question and any future bills should be paid when due.

c. Annual Notification of Rights and Responsibilities

The submeterer will, at the time service is initiated (including implementation of submetering) to a residential customer and at least annually thereafter, provide the customer the following information in compliance with the Home Energy Fair Practices Act (HEFPA):

- (1) a description of the submetering complaint handling procedures available at the Owner/Management Office and the Commission;
- (2) the rights and obligations of residential customers relating to payment of bills, terminations, disconnections and suspension of service and reconnection of service;
- (3) a description of special protections afforded the elderly, blind and disabled; persons with medical emergencies; persons receiving public assistance, supplemental security income benefits or additional State payments;
- (4) a request that residential customers who qualify for the protections referred to in subdivisions (b) of section 11.5 which refer to customers who are elderly, blind or disabled and subdivision (c) of section 11.5 which provides special procedures to be followed during cold weather periods.

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(5) the right of a customer to designate a third party to receive copies of all notices relating to termination, disconnection and suspension of service or other credit notices;

(6) a description of the customers' rights in regard to deferred payment plans and the holding and requesting of security deposits by the submeterer; and

(7) a description of the submeterer's budget or levelized payment plans.

(5) a procedure for notifying in writing all tenants of the proposal to submeter.

The applicant or its consultant will prepare form letters to tenants that incorporate the aspects of the proposed submetering program described above. The letters will explain:

1. the economic advantages of submetering over direct utility metering
2. the type of submetering system to be installed and a validation of its reliability and accuracy
3. the method and basis for calculating rates to tenants, which shall include a maximum rate provision (rate cap) preventing charges to tenants from exceeding the utility's tariffed residential rate for direct metered service to such tenants
4. complaint procedures and tenant protections consistent with the Home Energy Fair Practices Act (Public Service Law, sections 31-50; 16 NYCRR Parts 11 and 12)

The applicant assisted by its consultant will supervise the distribution of these letters and communications between the tenants, landlord and the PSC to make sure that the proposal is understood and that any outstanding issues are properly addressed. An informational meeting will be held with the tenants to explain the submetering procedures and address questions of administration.

(6) enforcement mechanism is available to the tenants to ensure that their rights are protected under the law

The complaint procedure detailed in section 4 above constitutes the tenant's standard enforcement program, which is in compliance with the Home Energy Fair Practices Act. The setting of rents in relationship to tenant incomes and utility costs is supervised and an enforcement mechanism is provided by the NYC Housing Development Corporation. As the project Lender, the HDC mortgage documents include a Regulatory Agreement that requires HANAC AHRA to comply with low income certification standards and NYC HDC procedures for rent determinations that enable NYC HDC to assure compliance with Federal rules for the Low Income Housing Tax Credits that financed the project.

(7) certification that all required proposal information for tenants shall be incorporated in plain language into all leases governing submetered premises;

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The method of rate calculation, the rate cap, complaint procedures, tenant protections and the enforcement mechanisms will be incorporated in plain language into all leases governing the submetered premises. Program features will be incorporated into all leases, under authority of an order from the PSC, to make the submetering program an integral part of the landlord-tenant relationship. This authority will be employed to encourage tenant cooperation and provides a firm foundation for enforcement.

Enforcement and consumer protections will be accompanied with tenant education about the benefits of comprehensive building wide submetering. It will be emphasized that the implementation of submetering meets objectives of electric efficiency and fairness for the entire building. Current utility allowance formulas do not allow for major disparities in electricity usage between apartments of the same size. Under a submetered system, high users will pay more and lower users will pay less, according to their actual usage. When residents pay for the electricity they use, they will have a financial incentive to reduce waste and improve efficiency.

(8) a description of an appropriate rent reduction formula that accurately reflects the applicant's overall reduction in his total electric costs resulting from conversion to submetering:

By regulatory agreement, NYC Housing Development Corporation supervises the setting of rents in accordance with Internal Revenue Code formulas applied to tenants' income to assure the affordability of the units in the Low Income Tax Credit Program. Where the rent is not to include the landlord's providing electricity to the tenant, the rents do not include the utility allowance and are lower by that amount contrasted to what they would have been if the rents included in apartment electricity usage such as in older originally master metered buildings. At George T Douris Tower, electricity is being provided to tenants without charge pending an order from the PSC approving submetering.

Rents charged to the tenants are already reduced by the amount of a utility allowance based on the number of rooms per apartment. Therefore in effect the rent reduction formula has already been applied.

ATTACHEMENTS TO:

Application and Plan of
HANAC Astoria Housing Redevelopment Associates, L.P.
for the Submetering
of George Douris Tower

Attachment	A	The PowerHawk 6320 System Overview.....	4 pages
Attachment	B	Certificate of Approval for Weighing and Measuring Devices from the State of California	4 pages
Attachment	C	HEFPA compliance documents and checklist.....	16 pages

The PowerHawk 6320

SYSTEM OVERVIEW



SMART METERING MADE SIMPLE

The PowerHawk 6320

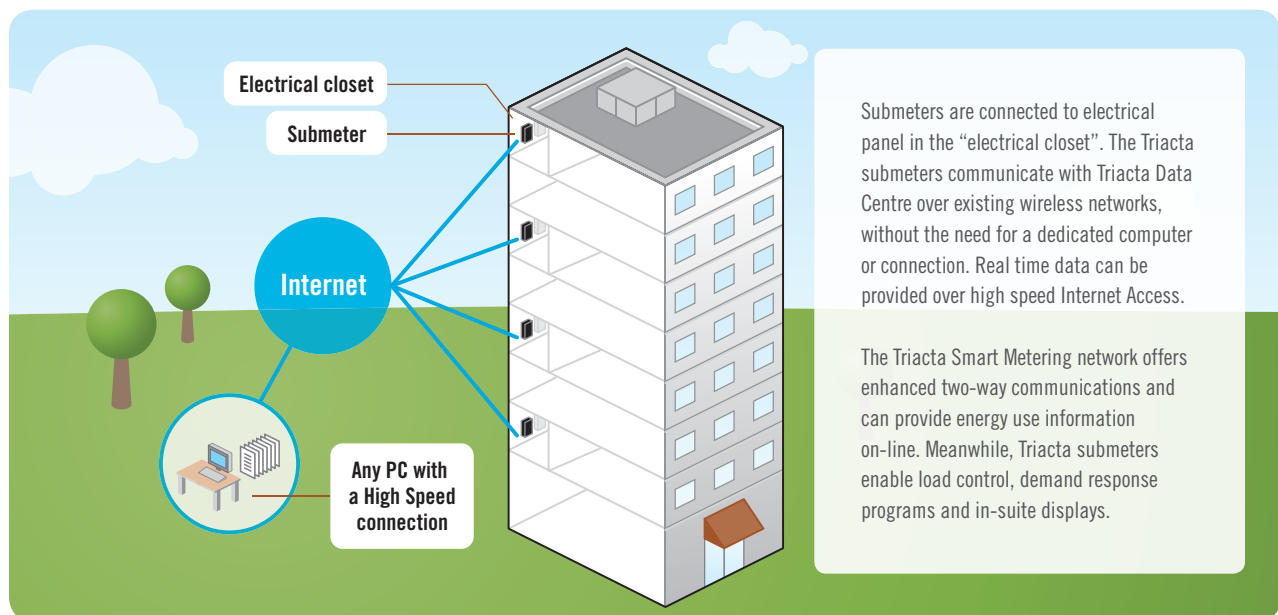
System Overview



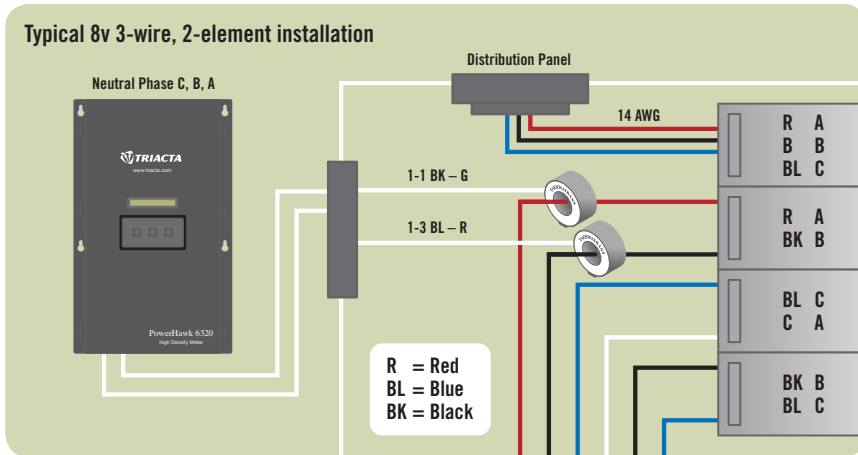
Triacta integrates advanced telecommunications technology with submetering equipment to make smart metering simple and cost effective. Research shows that when smart meters are installed about 60 percent of tenants experience a net reduction in their monthly energy costs. Users pay for only the energy they use.

Triacta smart meters are easily “plugged” into a building’s main electrical feed - saving time and eliminating rewiring costs. And, Triacta smart meters can transmit data over any existing wireless, high speed internet or a standard phone line - without the need for a dedicated connection.

SUBMETERING: HOW IT WORKS

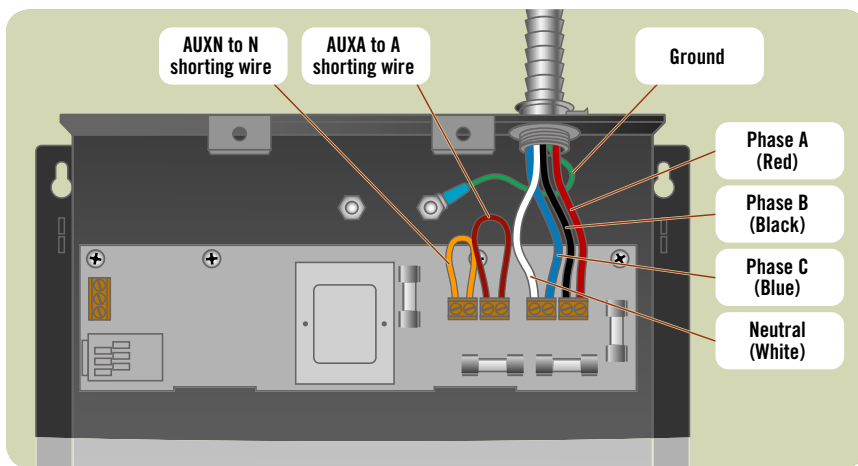


Typical 8v 3-wire, 2-element installation



CT INSTALLATION

- CT connections on the PowerHawk 6320 are made using two 25-pair cables provided
- Each cable contains 25 pairs of colour-coded wires
- Cable 1 contains connections for meters 1 to 10; Cable 2 has connections for meters 11 to 20
- Each of the meters to be connected to the PowerHawk 6320 is assigned a specific pair of colour-coded wires
- Meters are identified by number and CT; meters 1-5, 10-15 can have 2 or 3 CTs, and meters 6-10, 16-20 have 2 CTs only



A typical power connection for the PowerHawk 6320 in a three phase application

We make it simple

SAFE

- complies with all regulatory electric safety requirements
- UL listed and CSA approved
- meets all known international standards for meter accuracy including ANSI C12.1, C12.18, C12.20 and Measurement Canada LMB-EG-07 (AE-1434)

FLEXIBLE

- compatible with 208V/240V Y services (up to 600V with step-down transformer)
- single phase, network and poly phase applications
- mA CT and 5A Ct compatible
- single and poly phase installations only require two live phases plus neutral connections
- higher voltage services require external potential transformers
- supports all time of use options, including seasonal and critical peak pricing scenarios
- meter data is stored in non-volatile memory that is unaffected by power outages

EASY TO INSTALL

- easily installed in a less than a day by a single technician
- size of a clipboard
- readily connects to an existing distribution panel
- built in per-phase debugging reduces installation errors

Find out how submetering can save you time, money and energy.

Contact us at 1-877-PWRHAWK (1-877-797-4295), or by email at sales@triacta.com or visit www.triacta.com

PowerHawk 6320 – System Specifications

Specification	Description
Dimensions	Height: 16 in. (40.6 cm)
	Width: 10 in. (20.3 cm)
	Depth: 2 in. (5.1 cm)
Weight	2.4 Kg
Input Voltage	120/208 V, 3W+N+PE
	120/208 V, 2W+N+PE
	120/240 V, 2W+N+PE
Voltage Tolerance	+/-10%
Maximum current	80 mA, 60 Hz
Current probes	200A Primary
Measurement accuracy	+/- 0.5%
NVM Storage	120 days in 15-minute intervals
Onboard Modem	V.90
Onboard Ethernet port	10 Mb/s
Fuse Rating	F1, F2, F3, F4: 80 mA, 250 VAC, time lag
Operating Temperature	0 to 50°C
Operating Humidity	0 to 90% non-condensing
Environment	For indoor use only
Maximum altitude	2000 m
Pollution Degree	2
Max CT Cable for mA CTs	100m
mA CT cable type	22 awg twisted pair
Max CT Cable for 5A CT's	3.5 m
5A CT Cable type	18 awg twisted pair



Triacta is a leading developer and manufacturer of smart meters. We make it easy for facility managers, energy service companies and local distributors to individually bill residential and commercial tenants for electricity consumed. And, we enable businesses in a variety of sectors to better manage their electricity costs and consumption by providing meaningful and timely information not available from electricity suppliers.

www.triacta.com

Triacta Power Technologies Inc.
Corporate Head Office
Box 582, 7 Mill Street, Almonte ON
Canada, K0A 1A0

State of California
Department of Food and Agriculture
Division of Measurement Standards

Certificate Number: 5563-08
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California Type Evaluation Program
Certificate of Approval
for Weighing and Measuring Devices

For:

Electronic Watthour Meter
Models: 6320-XP-X0
Generic Name: PowerHawk 6320
Voltage Rating: 120/208/240 VAC
Class (CL): 200 (200 Amps Max.)
Test Amps (TA): 30 Amps
Watthour Test Constant (Kh) = 1 Wh or 0.001 kWh

Submitted by:

Triacta Power Technologies
P.O. Box 582, 7 Mills Street
Almonte, Ontario, Canada K0A 1A0
Tel: (613) 256-2868
Fax: (613) 256-6602
Contact: Wes Biggs
Internet: www.triacta.com

Standard Features and Options

Model Number Matrix Designation:

6320	-	XP	-	X0
Base Unit	-	X = Number of Phases or elements	-	10 = 10 meters
Model No.		(CTs) per meter. 1, 2, or 3		20 = 20 meters

Internal Scrolling Indicator:

LCD (Liquid Crystal Display), 1.000 kWh register.

Current Transformers (CTs):

200A, CTR 200:0.08A or 2500:1, Triacta Model Number 900-313-01 (Filtran 7896 or Taewatrans TZ106L)
Accuracy class 0.1, Burden 15.0, 600V Insulation Rated, Rated Frequency 60 Hz

Triacta Model 9320 External Pulse Box:

Required to perform accuracy tests and certify the electric watthour meter. This device must be supplied to the local weights and measures test facility to perform specific California Code of Regulations test requirements.

Note: A meter identification key must be posted by the meter's indicator to identify which meter serves which tenant.

This device was evaluated under the California Type Evaluation Program (CTEP) and was found to comply with the applicable technical requirements of California Code of Regulations for "Weighing and Measuring Devices." Evaluation results and device characteristics necessary for inspection and use in commerce are on the following pages.



Effective Date: July 28, 2008

Edmund E. Williams, Director

Triacta Power Technologies
Electronic Watthour Meter
Models: 6320-XP-X0

Application: For use as a watthour metering system in legally sub-metered electric service applications.

Identification: The main meter identification information is on the face of the meter case. The external CT's identification is on each CT. The serial number is on the main label and on the printed circuit board (PCB). The serial number is also accessible from the internal scrolling LCD indicator by pressing and holding, approximately 3 seconds, the select button until the "diagnostic" mode is displayed. Press the select button again until the "Local IP address" is displayed. Then press the right arrow button until the "serial number xxxxxxxx" is displayed.

900-313-01	Rev A.00
Accuracy Class 0.1	Ratio 2500:1
S/N 0251070647-P9-1	

↓

CT Label

POWERHAWK Model No 6320-3P-10 HIGH DENSITY SMART METER	
Frequency:	60Hz
4 Wire, 3 Element, Y Configuration	
Rated Voltage:	120/208/240 VAC
Metering Points:	10
Temperature Range:	0°C-50°C
Max. Probe Length:	100m, 22AWG
Class (CL):	200 (200A Max)
CT Ratio:	2500:1
Kh:	1 Wh
Test Amps (TA)	30
Serial Number:	0251070647

Main
Identification
Label

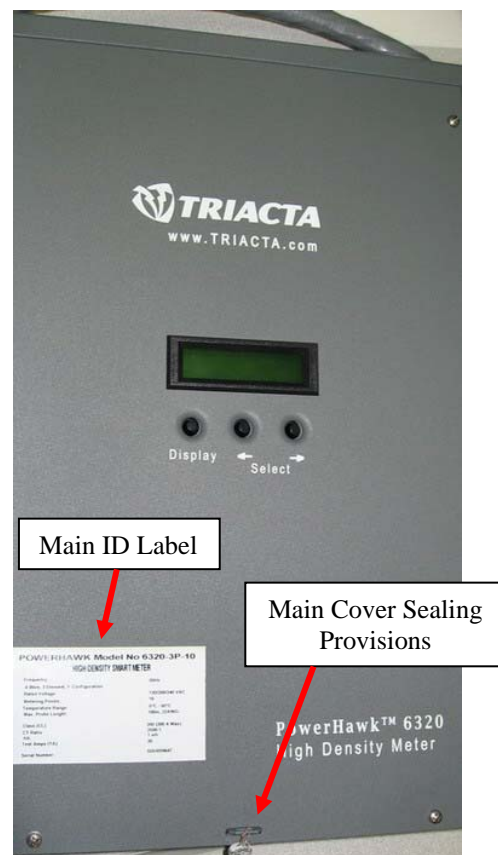
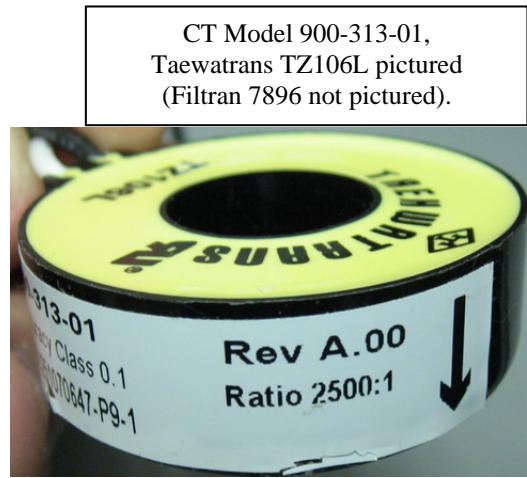


Serial Number
displayed on the
LCD indicator.

The serial number
is the same for all
20 meters.

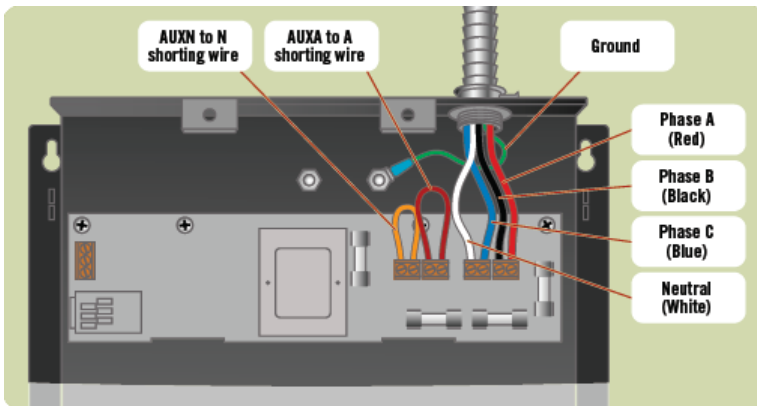
Triacta Power Technologies
Electronic Watthour Meter
Models: 6320-XP-X0

Sealing: Category 2 with a physical seal and no event counters. The printed circuit board cover (PCB) utilizes a physical seal to prevent access to the PCB. The system's main cover is also protected by a physical security seal preventing access to the system's configuration, calibration access points, and Cat. 5 connection. When calibration switch is in the "unlocked" position metrological related settings can be changed via a remote laptop computer through a Cat. 5 connection. The internal scrolling LCD indicator will display "unlocked" in this state. When the dip switch is in the "off" or "locked-out" position the meter is in the normal usage mode. This prevents the meter from being sealed and used in the unlocked (calibration/configuration mode). See unlocked position picture below.

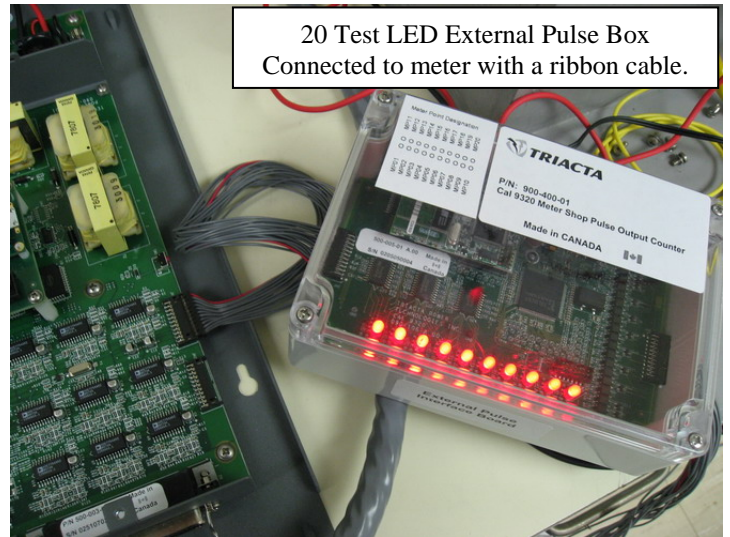


Triacta Power Technologies
Electronic Watthour Meter
Models: 6320-XP-X0

Operation: The device has an internal scrolling register and displays each meter indication for approximately 5 seconds. Pressing the left or right arrows will scroll the indicator to a particular meter indication (see the note on page 1). An external pulse box must be utilized for testing (disconnected when testing is completed) and must be provided to the officials responsible for verifying meter performance. The pulse box must be attached to the meter with a ribbon cable (See picture below) and has 20 red pulsing LED's that flash on and off when a load is applied to a specific meter or CT. The red LED's are normally illuminated, then flash off momentarily indicating 0.001 Kwh or 1 watt-hour per flash. CT's line and load are direction sensitive. The arrow on the CT points toward the load.



Electrical Hookup for Testing Purposes

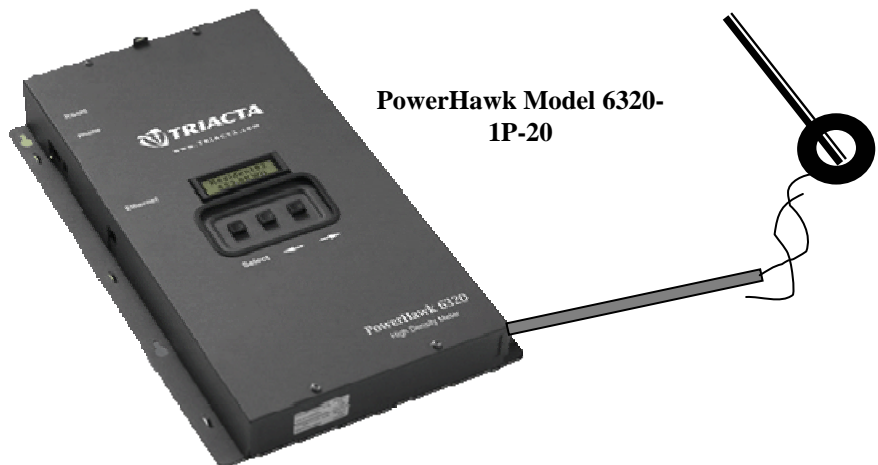


Test Conditions: Meter model 6320-3P-10 with external current transformers and an external pulse box were submitted for evaluation. Three meters were randomly selected for initial testing at the Division of Measurement Standards (DMS) lab. The meters were then installed on a test bench at DMS with various loads. After a permanence period of approximately 29 days the meters were retested. The meters were subjected to accuracy tests from 3 amps to 30 amps at both unity and 0.5 power factors. Starting load and creep tests were also conducted.

Results of the evaluation indicate the devices comply with applicable requirements.

Type Evaluation Criteria Used: Title 4, California Code of Regulations, 2008 Edition

Tested By: John Roach (CA)



Attachment C HEFPA compliance documents and checklist

Submeterer Instructions on required notices, forms and procedures for compliance with consumer protections under the Home Energy Fair Practices Act (HEFPA).

These instructions shall apply to the submetered electricity service provided to residential apartments at the following premises:

Name of Premises: GEORGE T. DOURIS TOWER
Address: 27-40 Hoyt Avenue South
(a/k/a 25-03 29th Street, a/k/a/ 28-31 Astoria Boulevard)
Queens, New York.

The Owner and submeterer of premises is:

Title Ownership Name: HANAC ASTORIA HOUSING REDEVELOPMENT
ASSOCIATES, L.P. (a/k/a HANAC, a/k/a/ HANAC AHRA).
Address: 49 West 45th Street,
New York, N.Y. 10036
Phone: 212-840-8005
Primary Contact: John P. Kaiteris, Executive Director
e-mail: jkaiteris@hanac.org

The Managing Agent for the Owner as submeterer is:

Name of Management Company: The Wavecrest Management Team, Ltd.
Address: 87-14 116th Street,
Richmond Hill, NY 11418,
Phone: 718-463-1200.
Primary Contact: Christina Harsch
e-mail: charsch@twmt.net

Tenant complaints concerning electricity services, billing and compliance with HEFPA procedures will first be directed to the HANAC AHRA's Managing Agent:

The term "submeterer" as used in these procedures will apply to HANAC and or its Managing Agent.

HANAC will designate the Managing Agent prior to Public Service Commission Approval of submetering electricity to residents of the Premises and these procedures. HANAC may directly perform any of the responsibilities as submeterer or delegate them to its Managing Agent. These procedures will apply to any subsequent Managing Agents employed by HANAC. The Attached HEFPA forms will be edited to include the name, address, contact person and telephone number of the Managing Agent. Up to date contact information for HANAC and its Managing Agent will be provided to all residents including contact persons, addresses and phone numbers.

Annual Notification of Rights

The submeterer, HANAC ASTORIA HOUSING REDEVELOPMENT ASSOCIATES, L.P. (HANAC AHRA) assisted by its Managing Agent, shall, at the time service is initiated to residential customers at the premises and at least annually thereafter, by a notice accompanying a regular bill or in a separate mailing, provide residential customers with a summary of their rights and obligations under the Home Energy Fair Practices Act (HEFPA) and the Energy Consumer Protection Act of 2002.

At a minimum, the summary shall include the following:

- a description of the complaint-handling procedures available at HANAC AHRA and its Managing Agent and the NYS Public Service Commission (the commission);
- the rights and obligations of residential customers relating to payment of bills, termination, disconnection and suspension of service and reconnection of service;
- a description of special protections afforded to the elderly, blind and disabled; persons with medical emergencies; persons receiving public assistance, supplemental security income benefits or additional State payments;
- a request that residential customers who qualify for the protections referred to above voluntarily so inform the Managing Agent;
- the right of a customer to designate a third party to receive copies of all notices relating to termination, disconnection and suspension of service or other credit notices;
- appropriate forms that customers claiming the protections identified above may fill out and return;
- a description of the customers' rights in regard to deferred payment plans and the holding and demanding of security deposits by the Managing Agent; and
- a description of the Managing Agent's budget or levelized payment plans.

Checklist of Procedures, Forms and Instructions:

HANAC AHRA has developed written procedures forms and instructions to protect submetered electricity customers under the Home Energy Fair Practices Act (HEFPA) and the Energy Consumer Protection Act of 2002. These documents shall be filed with the Office of Consumer Services at the Commission. The following represent the procedures and forms proposed to the Commission for approval:

The Procedures, Forms and Instructions include:

- Special Protections Registration Form
- Residential (Deferred) Payment Agreements
- Asset Evaluation Form
- Budget Billing Form
- Reminder Notice
- Final Termination Notice
- Notice to Social Service of Customer Inability to Pay

Deferred Payment Agreements (DPA)(§11.10)

HANAC has developed written DPA procedures and forms for evaluating the financial need of a customer or applicant, for assuring the confidential handling of such information, for arriving at fair and equitable payment terms and for training its personnel, which procedures shall be filed with the Office of Consumer Services at the Commission.

A Deferred Payment Agreement (DPA) is a written agreement for the payment of outstanding charges over a specific period of time, signed by both the Managing Agent and the customer or applicant. The Managing Agent will make reasonable efforts to contact eligible customers for the purpose of offering a DPA and negotiating terms tailored to the customer's financial circumstances, prior to making the written offer of a DPA. A DPA:

- will provide for installments as low as \$10 per month and no down payment, when the customer demonstrates financial need for such terms;
- may provide for any size or no down payment, and installments on any schedule over any period of time if mutually agreed to by the parties;

DPA Form

A DPA form shall in clear and understandable language and format contain the following information:

- that the Managing Agent is required to offer a DPA that the customer is able to pay, considering his or her financial circumstances, and that the DPA should not be signed if the customer is unable to pay its terms;

- that if the customer demonstrates financial need, alternate terms will be available, a down payment may not be required, and installments may be as low as \$10 per month above current bills;
- that assistance to pay submeterer bills may be available to recipients of public assistance or supplemental security income from a local social services office;
- that if the customer is unable to pay the terms of the DPA, or if for any other reason the customer wishes to discuss the DPA, the customer should call the Managing Agent at a specified telephone number, and that if any further assistance is needed, the customer should call the Public Service Commission at a specified telephone number;
- that by signing and returning the form together with any required down payment to the Managing Agent within the required time period, the customer will be entering into a DPA, and by doing so, will avoid termination, disconnection or suspension of service;
- the date by which the copy signed by the customer, and any applicable down payment, will be received by the Managing Agent in order to avoid termination, disconnection or suspension of service, if applicable, provided, however, that such date may not be less than six business days after the DPA is sent by the Managing Agent;
- HANAC AHRA's policy if the DPA is not signed and returned as required;
- the total amount due, the required down payment, if any, and the exact dollar amount and due date of each installment;
- that if the customer fails to comply with the terms of the DPA, HANAC will take steps to terminate, disconnect or suspend service;
- that the customer has a right to immediate enrollment on a levelized payment plan. This notice will be placed close to the signature line, include a conspicuous check-box option, and give a specified telephone number to call the Managing Agent for more information;
- brief explanation of the levelized payment plan; and that if the customer later can demonstrate that his or her financial circumstances have changed significantly because of conditions beyond his or her control, the Managing Agent will amend the terms of the DPA to reflect such changes.

Asset Evaluation Form

- The Managing Agent may require that a customer complete a form showing assets, income and expenses, and provide reasonable substantiation of the information on that form.

The form will be handled confidentially.

Budget/Levelized Payment Plans

- The Managing Agent shall offer residential customers a voluntary budget billing or levelized payment plan for the payment of charges.
- The plan shall be designed to reduce fluctuations in customers' bills due to seasonal patterns of consumption.
- Unless otherwise authorized by the commission, each such plan shall be based on the customer's recent 12-month experience, adjusted for known changes. If 12 months of billing data are not available for the customer, then 12 months of billing data for the premises shall be used. If 12 months of billing data are not available for the premises, then the Managing Agent shall estimate future consumption over the next 12-month period.
- Each such plan shall provide that bills clearly identify consumption and state the amounts that would be due without levelized or budget billing; such information need not be supplied on interim bills for customers billed on a bimonthly basis.
- Each such plan shall provide that bills be subject to regular review for conformity with actual billings.
- Each such plan shall be filed with the commission, and any significant changes in the plan shall be submitted to the commission for review before implementation.

Reminder Notice

If a customer fails to make timely payment in accordance with a DPA, the Managing Agent will send a reminder notice at least eight calendar days prior to the day when a final notice of termination, disconnection or suspension will be sent, stating in conspicuous, bold type that:

- the customer will meet the terms of the existing DPA by making the necessary payment within 20 calendar days of the date payment was due or a final termination, disconnection or suspension notice may be issued;
- if the customer can demonstrate that he or she is unable to make payment under the terms of the DPA because his or her financial circumstances have changed significantly because of conditions beyond his or her control, the customer should immediately contact the Managing Agent at a specified telephone number because a new DPA may be available.

If by the 20th calendar day after payment was due, the Managing Agent has neither received payment nor negotiated a new DPA, the Managing Agent may demand full payment of the total outstanding charges and send a final termination, disconnection or suspension notice which states:

- that if the customer can demonstrate that he or she is unable to make payment under the terms of the DPA because his or her financial circumstances have changed significantly because of conditions beyond his or her control, the customer should immediately contact the Managing Agent at a specified telephone number because a new DPA may be available;

- that assistance to maintain submeterer service may be available from a local social services office;
- that before the social services office will provide assistance, the customer generally will provide the Managing Agent with information showing assets, income and expenses to evaluate whether the customer is entitled to a new DPA; and
- either the address and telephone number of the appropriate social services office, or the local social services information number.

If the final termination, disconnection or suspension notice is sent because the customer has broken a DPA which required payment over a shorter period than the standard DPA for that customer would allow, the final termination, disconnection or suspension notice will also be accompanied by a written offer of a new DPA to pay the outstanding balance in monthly installments.

Final Notice of Termination

If by the 20th calendar day after payment was due, the Managing Agent has neither received payment nor negotiated a new DPA the Managing Agent may demand full payment of the total outstanding charges and send a final notice of termination to the customer. The final notice of termination will include:

- the earliest date on which termination or disconnection may occur;
- the reasons for termination, including the total amount required to be paid, and the manner in which termination may be avoided;
- the address and phone number of the office of the Managing Agent that the customer may contact in reference to his account;
- the availability of submeterer procedures for handling complaints;
- a summary, prepared or approved by the commission or its authorized designee, of the protections available together with a notice that any customer eligible for such protections should contact the Managing Agent.
- The Final Notice of Termination may include any additional information not inconsistent with the regulations.
- The Final Notice of Termination will state, in a size type capable of attracting immediate attention, language conveying the following: THIS IS A FINAL TERMINATION NOTICE. PLEASE REFER TO THIS NOTICE WHEN PAYING THIS BILL.

The Final Notice of Termination will inform the customer that suspension of the customer's distribution service can accompany the ESCO's commodity termination, even if the customer's account for distribution service is current.

Special Notification of Social Services

After the Managing Agent has sent a final notice of termination to a residential customer who it knows is receiving public assistance, supplemental security income benefits or additional State payments pursuant to the Social Services Law, and for whom the Managing Agent has not received a guarantee of future payment from the local social services commissioner, it shall, not more than five days nor less than three days before the intended termination or disconnection,

notify an appropriate official of the local social services district that payment for submeterer services has not been made.

- Such notification shall state that the customer has been sent a final notice of termination, specify the amount of arrears, and state the earliest date on which termination or disconnection may occur.
- In the case of a customer for whom the Managing Agent has received a guarantee of future payment from the local social services commissioner, the Managing Agent shall send a notice of nonpayment stating that payment has not been made and indicating the amount of the arrears to the recipient and to the local social services commissioner at the time the account would otherwise be subject to a final notice of termination or disconnection.
- If the notification is made orally, the Managing Agent shall within one business day mail a written notification to such social services official.
- The Managing Agent shall, after consultation with an appropriate official in the social services district of the county of the Premises, compile and maintain a list of the social services officials who are to receive such notifications.

The Managing Agent may notify an appropriate social services official that a customer it knows is receiving public assistance, supplemental security income benefits or additional State payments has failed to make timely payment for submeterer service, whenever it believes special circumstances affecting such customer should be brought to the immediate attention of the social services official. Such notification shall describe the special circumstances observed, specify the amount of arrears, and state the scheduled date of termination or disconnection, if one has been set.

SPECIAL PROTECTIONS REGISTRATION FORM

Please complete this form if any of the following conditions or circumstances apply and return it to the HANAC AHRA Managing Agent at:

The Wavecrest Management Team, Ltd.

Address: 87-14 116th Street,
Richmond Hill, NY 11418,

Phone: 718-463-1200.

Primary Contact: Christina Harsch

e-mail: charsch@twmt.net

ACCOUNT INFORMATION: (Be sure to complete before mailing)

Name

Address Apartment

Town/City/zip code

Telephone Number (Daytime)

(Evening)

Account Number (if there is one, as shown on bill)

➤ **I would like to be considered for special protections.** _____

➤ **In my household (Check all that apply):**

_____ Customer is 62 years of age or over and all other persons residing therewith are either 62 years of age or older, under 1g years of age, blind or disabled.

_____ Customer is blind (legally or medically).

_____ Customer has a permanent disability.

_____ Customer or a resident of customer's household has a medical hardship (list type):

_____ Customer or a resident of customer's household suffers from a condition which requires a life-sustaining device or other life support equipment (list type):

➤ **I receive government assistance.**

_____ I receive Public Assistance (PA). My case number is:

_____ I receive Supplemental security Income (SSI. Note: SSI benefits are not the same as Social Security retirement benefits. My Social Security Number is (**provision of number is optional**):

➤ **Please send me more information about Balanced Billing ____.**

➤ **To be completed by Third Party Designee (optional).**

Please let me know if this customer's bill is overdue. As "Designee/Caregiver" I understand that I am not responsible for the payment of any electric bills.

Designee/Caregiver/Agency

Address Apartment/Office

Town/City zip

Telephone Number Daytime Evening

Third Party Designee Name Signature

Residential Payment Agreement

Customer Name: _____
Address: _____
Account# _____

The total Amount owed to [HANAC AHRA] for this account as of MM/DD/YYYY is **\$XX.XX**.

[HANAC AHRA] is required to offer a payment agreement that you are able to pay considering your financial circumstances. **This agreement should not be signed if you are unable to keep the terms.** Alternate terms may be available if you can demonstrate financial need. Alternate terms may include no down payment and payments as low as \$10 per month above your current bills. **If you sign and return this form, along with the down payment by MM/DD/YYYY you will be entering into a payment agreement and by doing so will avoid termination of service.**

Assistance to pay submeterer bills may be available to recipients of public assistance or supplemental security income from your local social services office. This agreement may be changed if your financial circumstances change significantly because of conditions beyond your control. If after entering into this agreement, you fail to comply with the terms, [HANAC AHRA] may terminate service. If you do not sign this agreement or pay the total amount due of **\$XX.XX** by **MM/DD/YYYY**, [HANAC AHRA] may seek to terminate your service. **If you are unable to pay these terms, if further assistance is needed, or if you wish to discuss this agreement please call the HANAC AHRA Managing Agent at**

The Wavecrest Management Team, Ltd.
Address: 87-14 116th Street,
Richmond Hill, NY 11418,
Phone: 718-463-1200.
Primary Contact: Christina Harsch
e-mail: charsch@twmt.net

Payment of Outstanding Balance:

Your current monthly budget amount is: \$XX.XX

If you are not already enrolled in our Budget Billing Program, which allows you to pay for your service in equal monthly installments, and wish to enroll, check the box below and we will start you on our program immediately.

Yes! I would like Budget Billing

Acceptance of Agreement:

Customer Signature: _____ Date:

This agreement has been accepted by [HANAC AHRA]. If you and [HANAC AHRA] **cannot** negotiate a payment agreement, or if you need any further assistance, you may contact the Public Service Commission at 1-800-342-3377.

Return one copy of this agreement signed, with the down payment, by MM/DD/YYYY. If it is not signed and returned, your service may be terminated.

The HANAC AHRA Managing Agent
Credit and Collections

The Wavecrest Management Team, Ltd.

Address: 87-14 116th Street,
Richmond Hill, NY 11418,

Phone: 718-463-1200.

Primary Contact: Christina Harsch

e-mail: charsch@twmt.net

CONFIDENTIAL
Evaluation of Customer's Ability To Pay

1. Employer Name, Address and Phone Number

2. What is your monthly income? _____
3. Please identify all other forms of income (Unemployment, Disability, and Public Assistance) and the amounts of each

4. Please list all checking and savings accounts and balances:

5. Please list all credit cards, balances due and the amount of the monthly payment on each:

6. Do you own your home or do you rent? _____

7. What is your monthly mortgage or rent payment? _____

8. List other assets (i.e., Stocks and Bonds) :

9. List other debts (bank loans, credit lines, utility bills, etc.) and the amount of the monthly payment on each:

10. Identify all other monthly expenditures by amount:

- Food expenses	\$	_____
- Medical expenses	\$	_____
- Telephone bills	\$	_____
- Utility bills	\$	_____
- Mandatory loan/credit card payments	\$	_____
- Other	\$	_____
	\$	_____
	\$	_____
	\$	_____

BUDGET BILLING PLAN

Customer Name: _____
Address: _____
Account# _____

Under this Plan, HANAC AHRA agrees to provide services in return for your agreement to make payments according to the terms of this Plan.

This Plan requires that you pay \$XX.XX per month for the 12 month period starting with the billing cycle commencing on MM/DD/YYYY and ending on MM/DD/YYYY.

Such equal monthly payment is based on an estimate of your annual billing, which has been calculated by multiplying the average monthly consumption by the current estimate of commodity prices over the above-referenced 12-month period. Your average monthly consumption is _____ kwh, based on your last 12 months actual consumption. If the service address for which you will be billed under this Plan is a new property, which has not been served or for which 12 months of data is not available, your average monthly consumption will be based on a similar property in the area in which the service address is located.

The minimum number of days required in a meter reading cycle shall be at least 25 days to qualify for a budget bill for such a period. In case of shorter meter reading intervals, you will receive a bill reflecting actual charges for such shorter period. However, you will be required to make a payment only when at least 25 days have been accumulated for the budget bill amount.

The Plan shall be subject to regular review for conformity with actual billings. HANAC AHRA reserves the right to recalculate such monthly payment to reflect either (a) an significant increase in consumption beyond the average monthly consumption.

Each month, you will be billed the equal monthly payment and you will be required to pay such amount stated on the bill. Your bill will also inform you what your consumption for the period was, as well as the actual charge you would have incurred if you were not on the Plan. If you fail to pay the bill when due, you may be subject to termination of service pursuant to the Home Energy Fair Practices Act.

In the last month of the Plan, the HANAC AHRA Managing Agent shall recalculate your account based on a comparison of the aggregate billing under this billing plan and the amount you would have been charged for the budget period if you were not on the plan. If you owe HANAC AHRA a sum of money due to the recalculation, you will be billed for the amount due. If you have been over billed you will be issued a credit to be applied to the next plan year.

Yes! I would like Budget Billing

Return one signed copy to HANAC AHRA MANAGING AGENT by MM/DD/YYYY.

The HANAC AHRA Managing Agent
Credit and Collections

The Wavecrest Management Team, Ltd.

Address: 87-14 116th Street,

Richmond Hill, NY 11418,

Phone: 718-463-1200.

Primary Contact: Christina Harsch

e-mail: charsch@twmt.net

Past Due Reminder Notice

CUSTOMER NAME: _____

PREMISE ADDRESS: _____

ACCOUNT NUMBER: _____

On MM/DD/YYYY you signed a Residential Deferred Payment Agreement (DPA) which obligated you to make a down payment of \$XX.XX by MM/DD/YYYY and regular payments of \$XX.XX in addition to your current charges, in order to avoid termination of commodity service. You have failed to comply with the terms of the DPA. We are notifying you that you must meet the terms of the existing DPA by making the necessary payment within 20 calendar days of the date payment due date, or a final termination notice may be issued to inform the impending termination of your service.

If you are unable to make payment under the terms of the Residential Deferred Payment Agreement because your financial circumstances have changed significantly due to events beyond your control, you should immediately contact us at (xxx) xxx-xxxx because a new payment agreement may be available. Assistance to pay submeter bills may be available to recipients of public assistance or supplemental security income from your local social services office by calling xxx-xxxx.

**The total amount owed to HANAC AHRA for this account as of
MM/DD/YYYY is: \$XX.XX.**

The HANAC AHRA Managing Agent
Credit and Collections

The Wavecrest Management Team, Ltd.

Address: 87-14 116th Street,
Richmond Hill, NY 11418,

Phone: 718-463-1200.

Primary Contact: Christina Harsch

e-mail: charsch@twmt.net

FINAL TERMINATION NOTICE

DATE

Customer Name: _____

Address: _____

Account# _____

Dear (customer name):

By letter dated MM/DD/YY, the HANAC AHRA Managing Agent notified you that your failure to remit the past due amount of \$XX.XX by MM/DD/YY would result in HANAC AHRA terminating your service. Our records indicate that we have not received your payment. Please remit \$XX.XX or your service will be terminated after MM/DD/YY.

If you disagree with the amount owed, you may call or write the Managing Agent at (Address and phone number), or you may contact the Public Service Commission at 1-800-342-3377.

THIS IS A FINAL TERMINATION NOTICE. PLEASE BRING THIS NOTICE TO THE ATTENTION OF THE MANAGING AGENT WHEN PAYING THIS BILL.

PLEASE REMIT \$XX.XX BY MM/DD/YY TO AVOID TERMINATION OF YOUR SERVICE.

If you are unable to make payment because your financial circumstances have changed significantly due to events beyond your control, please contact us at (XXX) XXX-XXXX. If you or anyone in your household meets any of the following conditions please contact us: medical emergency, elderly, blind or disabled.

Sincerely,

The HANAC AHRA Managing Agent
Credit and Collections

The Wavecrest Management Team, Ltd.
Address: 87-14 116th Street,
Richmond Hill, NY 11418,
Phone: 718-463-1200.
Primary Contact: Christina Harsch
e-mail: charsch@twmt.net

**NOTIFICATION TO SOCIAL SERVICES OF CUSTOMERS
INABILITY TO PAY**

From:

**HANAC Astoria Housing Redevelopment Associates, L.P.
Owner of
George T. Douris Tower**

Managed by:

The Wavecrest Management Team, Ltd.
Address: 87-14 116th Street,
Richmond Hill, NY 11418,
Phone: 718-463-1200.
Primary Contact: Christina Harsch
e-mail: charsch@twmt.net

Customer Name: _____

Address: _____

City, State, Zip: _____

Account#: _____

Customer has been sent a final notice of termination. If the total payment due of \$XX.XX is not paid by MM/DD/YYYY, termination of service may occur anytime after MM/DD/YYYY.