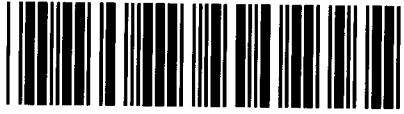


Control Number: 42852



Item Number: 28

Addendum StartPage: 0

RECEIVED
2014 OCT -7 AM 9:07
PUBLIC UTILITY COMMISSION
FILED

APPLICATION FROM THE CITY OF § PUBLIC UTILITY COMMISSION
SPLENDORA TO AMEND CCN NO. §
11727 IN MONTGOMERY AND § OF TEXAS
LIBERTY COUNTIES §

CITY OF PATTON VILLAGE’S PROPOSED LIST OF ISSUES

COMES NOW, the City of Patton Village (“Patton Village”), by and through its attorney of record, files this its proposed list of issues and would show the following:

LIST OF ISSUES

The Public Utility Commission (“Commission”) has requested by Order of Referral (September 26, 2014) a list of issues to be addressed in this docket and to be filed by interested parties. Patton Village has identified the following issues that should be addressed in this proceeding:

- 1) All criteria contained in P.U.C. Subst. R. § 24.102, in particular 24.102(b) and (d).

Patton Village is in the process of expanding, through acquisition, its water utility service. It has submitted its application for the sale, transfer or merger of a retail public utility with the TCEQ, now forwarded to PUC. Its application is pending before the PUC, Control No. 43132. Patton Village requests a determination whether the CCN requested by the City of Splendor (“Splendor”) overlaps and/or conflicts with Patton Village’s application and consequently, whether Splendor’s CCN is necessary for the targeted area (§ 24.102(d)(2)(3)).

In addition, Patton Village notes, also for consideration, that a number of landowners have filed their requests in this docket to opt out of the requested service (§ 24.102(d)(2)(A)). Further, in that the area proposed for service is primarily rural, Patton Village requests that the size of the

28

territory be weighed as a factor for the provision of service as well as the number of landowners to be served.

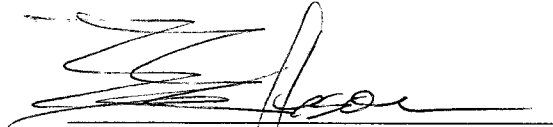
Finally, Patton Village cannot determine with certainty that Splendora has shown in its application that it has met the minimum requirements under § 24.102(b) particularly where water supply systems exist in the neighboring areas including that to be supplied by Patton Village upon approval of its merger application.

Moreover, Patton Village would seek the opportunity to opt out if such an option is available.

DATE: October 6, 2014

Respectfully submitted,

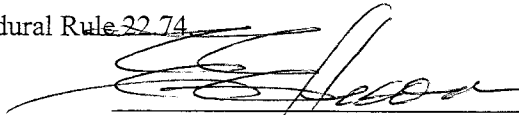
Alan J. Bojorquez
City Attorney, City of Patton Village
State Bar No. 00796224



Elizabeth Elleson
Assistant City Attorney, City of Patton Village
State Bar No. 14865575
12325 Hymeadow Dr. Ste. 2-100
Austin, Texas 78750
Phone: (512) 250-0411
Fax: (512) 250-0749
Elizabeth@TexasMunicipalLawyers.com

CERTIFICATE OF SERVICE

I certify that a copy of this document will be served on all parties of record on October 6, 2014, in accordance with P.U.C. Procedural Rule 22.74.



Elizabeth Elleson