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PUBLIC UTILITY COMMISSION  
OF TEXAS  
FILING CLERK

APPLICATION OF PEACH CREEK §  
DAM AND LAKE CLUB WATER §  
SYSTEM AND CITY OF PATTON §  
VILLAGE FOR SALE, TRANSFER, OR §  
MERGER OF FACILITIES AND §  
CERTIFICATE OF CONVENIENCE §  
AND NECESSITY IN MONTGOMERY §  
COUNTY, TEXAS (37915-S) §

PUBLIC UTILITY COMMISSION

### CITY OF PATTON VILLAGE'S PROPOSED LIST OF ISSUES

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

#### I. LIST OF ISSUES

On October 3, 2014, the Public Utility Commission ("Commission") issued its Order of Referral requiring the City and interested parties to file a list of issues to be addressed in this docket by October 22, 2014. This pleading is timely filed.

The City has identified the following issues that should be addressed in this proceeding:

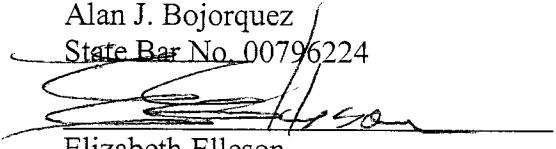
- 1) Has the City demonstrated adequate financial capability for providing continuous and adequate service to the requested area as required by Tex. Water Code Ann. §13.301(b)?
- 2) If the city cannot demonstrate adequate financial capability, should a bond or other financial assurance be required of the city to ensure continuous and adequate water service, as allowed under Tex. Water Code Ann. §13.301(c)?
- 3) Has the City demonstrated adequate managerial capability for providing continuous and adequate service to the requested area as required by Tex. Water Code Ann. §13.301(b)?
- 4) Has the City demonstrated adequate technical capability for providing continuous and adequate service to the requested area as required by Tex. Water Code Ann. §13.301(b)?

- 5) Does the sale, transfer or merger serve the public interest, a determination required under Tex. Water Code Ann. §13.301(d)?
- 6) Was public notice properly given as required by Tex. Water Code Ann. §13.301(a)(2)?
- 7) Does the City have a history of noncompliance with the requirements of the utility commission, the commission or the Department of State Health Services? Tex. Water Code Ann. §13.301(e)(3)(A)?
- 8) Does the City have a history of continuing mismanagement or misuse of revenues as a water service provider? Tex. Water Code Ann. §13.301(e)(3)(B)?
- 9) Has the City demonstrated the financial ability to provide the necessary capital investment ensuring the provision of continuous and adequate water service to water customers? Tex. Water Code Ann. §13.301(e)(4)?

DATE: October 22, 2014

Respectfully submitted,

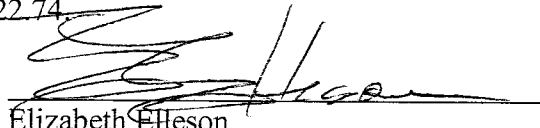
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#### CERTIFICATE OF SERVICE

I certify that a true and correct copy of the foregoing document was transmitted by fax, hand-delivery and/or regular, first class mail on this 22nd day of October, 2014 to the parties of record, in accordance with P.U.C. Procedural Rule 22.74.

  
Elizabeth Elleson