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PUBLIC UTILITY COMMISSION
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OF TEXAS

RATEPAYERS' APPEAL OF THE
DECISION BY THE TOWN OF
WOODLOCH TO CHANGE RATES
(37967-A, 37968-A)

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TOWN OF WOODLOCH'S LIST OF ISSUES

Pursuant to the Order of Referral of the Public Utility Commission ("PUC" or "Commission") issued December 18, 2014, requesting a list of issues to be addressed in this docket, the Town of Woodloch ("Woodloch") files this List of Issues.

I. ISSUES TO BE DETERMINED

In accordance with the foregoing, the following issues should be addressed:

1. Does the Commission have jurisdiction to consider the Petition under Texas Water Code § 13.043(c) regarding the necessity for at least 10 percent of the ratepayers signing the petition for review?
2. Was it just and reasonable for Woodloch to impose a surcharge for rate-case expenses on the class of customers who are pursuing an appeal of Woodloch's water and sewer rates in a different proceeding?
3. Was it discriminatory for Woodloch to impose a surcharge for rate-case expenses on the class of customers who are pursuing an appeal of Woodloch's water and sewer rates in a different proceeding?
4. Are Woodloch's rate case expenses reasonable under the facts related to their incurrence?
5. If the answer to 2. and/or 3. above is yes, then how should Woodloch's rate case expenses be reimbursed?
6. Should this matter be consolidated with the pending rate case between the same parties?

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II. CONCLUSION

WHEREFORE, PREMISES CONSIDERED, Woodloch respectfully requests that the Commission issue a Preliminary Order that identifies the issues to be addressed and not to be addressed in a manner consistent with this filing, and for such other relief as to which it has shown itself to be entitled.

Respectfully submitted,

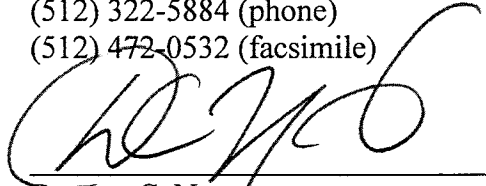
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Austin, Texas 78701

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A handwritten signature in black ink, appearing to read "D. Norton", is written over a horizontal line.

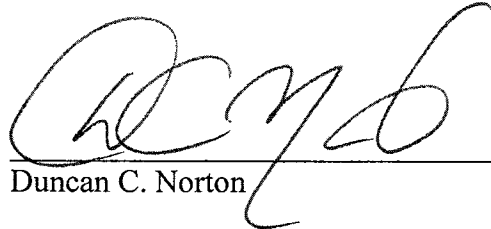
Duncan C. Norton

State Bar No. 15103950

ATTORNEY FOR TOWN OF WOODLOCH

CERTIFICATE OF SERVICE

I hereby certify that a true and correct copy of the foregoing Town of Woodloch's List of Issues has been served on the following counsel/parties of record by electronic mail, certified mail (return receipt requested), regular U.S. Mail, facsimile transmission and/or hand delivery on this 12th day of January, 2015.


Duncan C. Norton

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