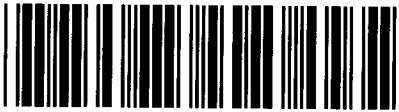


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**DOCKET NO. 45231**  
**SOAH DOCKET NO. 473-16-1836.WS**

RECEIVED

**RATEPAYERS' APPEAL OF THE  
DECISION BY TROPHY CLUB  
MUNICIPAL UTILITY DISTRICT  
NO. 1 TO CHANGE RATES**

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§

**PUBLIC UTILITY COMMISSION**

**OF TEXAS**  
PUBLIC UTILITY COMMISSION  
FILING CLERK

**TROPHY CLUB PUBLIC IMPROVEMENT DISTRICT RATEPAYER'S BRIEF IN  
OPPOSING THE BRIEF FILED BY THE TROPHY CLUB MUNICIPAL UTILITY  
DISTRICT NO.1'S TO SEVER THE PID PETITION.**

TO THE HONORABLE ADMINISTRATIVE LAW JUDGE:

The Ratepayers of the Trophy Club Public Improvement District (PID) files this brief in answer to the Motion to Sever PID Petition filed by the Trophy Club Municipal Utility District No. 1 (District) dated March 21, 2016.

I apologize in advance if the format of this brief is not correct but I am not an attorney nor am I consulting an attorney.

The arguments that have been put forth by the District are same arguments that have been previously submitted. As the Ratepayers representative in this action I can state that we believe that the motion filed by the District is without merit and should be dismissed.

The District claims that the PID Ratepayers are wholesale rather than retail customers. Actually the "Contract for Wholesale Water Supply and Wastewater Treatment Services and Wastewater Operational Services" (Contract) makes it perfectly clear to all parties that the District sets all rates, collects and retains all funds and maintains the entire infrastructure.

The claim by the District that the Town of Trophy Club sets the rates for the PID is blatantly false. Articles VI and VII make this perfectly clear.

Specifically Article VI 6.1(a) states that the Town shall pat the RETAIL CUSTOMER CHARGE and VII 7.1(a) states in part "Within 30 days of the Effective Date, Town shall adopt the Town Rate Order. Except as provided in Section 7.1(d) below, The Town Rate Order shall be identical to the existing MUD Rate Order."

Section 7.1(d) deals specifically with any capital improvements made by the MUD and is allowed so that PID residents pay their "fair share" of those improvements. It is a separate line item on the monthly water bill. This was adopted because prior to the Contract PID residents paid nothing for MUD capital improvements unless those costs were added to the water rate.

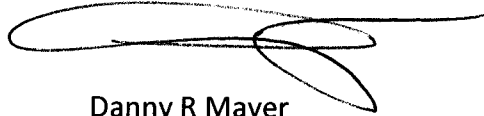
During the period that the Contract was negotiated between the MUD and the Town of Trophy Club I was a member of the Town Council. To be more precise I was one of two members of the Council that served on the committee which negotiated the Contract. The intent of "treating everyone the same" was always agreed to by all.

The argument that to not sever the PID from the Rate Appeal would have "Far Reaching Consequences" is totally without merit. To have such consequences there would need to be another MUD serving another PID with a similar contract somewhere in the State of Texas.

The PID Ratepayers have had no voice whatsoever in establishing the MUD water and wastewater rates. The Town of Trophy Club has likewise had no voice or input. This rate appeal is the only voice that is available to these citizens in this matter.

The PID Ratepayers respectfully requests that the PID Petition be allowed to remain as and that the PID Ratepayers be allowed to be a party in the filings in Docket No. 45231.

Respectfully submitted,

A handwritten signature in black ink, appearing to read "Danny R Mayer", with a long horizontal flourish extending to the right.

Danny R Mayer  
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