

Control Number: 45283



Item Number: 37

Addendum StartPage: 0

P.U.C. DOCKET NO. 45283

RECEIVED

SOAH DOCKET NO. 473-16-1834.WS

2016 MAY -9 AM 11: 04

RATEPAYERS' APPEAL OF THE
DECISION BY NORTH SAN SABA
WATER SUPPLY CORPORATION
TO CHANGE RATES

§
§
§
§

PUBLIC UTILITY COMMISSION

OF TEXAS

**NORTH SAN SABA WATER SUPPLY CORPORATION'S OBJECTIONS TO
BARBARA HORN'S DIRECT TESTIMONY**

TO THE HONORABLE ADMINISTRATIVE LAW JUDGE:

The North San Saba Water Supply Corporations (NSSWSC) hereby submits its objections to certain portions of the Direct Testimony of Ms. Barbara Horn, filed on April 29, 2016. NSSWSC would therefore move to strike selected portions of Ms. Horn's testimony for the reasons set out below:

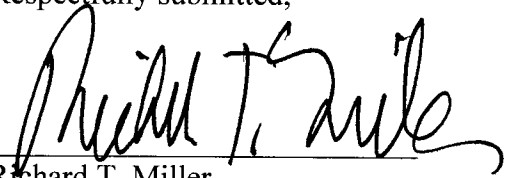
1) The Testimony of Barbara Horn Contains Information and Opinion Not Relevant to Any Issue to be Determined in This Proceeding.

NSSWSC objects to and moves to strike "Topic Two" on pages 2-4 of Ms. Horn's testimony as irrelevant. In that section of her testimony, Ms. Horn addresses and takes issue with an error she claims TCEQ made about 8 years ago. Testimony regarding a mistake in calculations made 8 years ago by an agency not party to these proceedings is not relevant to the issue of whether NSSWSC's most recent rate increase is just and reasonable, and it should be excluded.

II. Conclusion

WHEREFORE, PREMISES CONSIDERED, NSSWSC respectfully objects to the aforementioned portions of Barbara Horn's direct testimony and requests the Honorable ALJ strike the listed portions of such testimony. NSSWSC additionally requests any and all other relief to which it may be justly entitled.

Respectfully submitted,



Richard T. Miller
Texas Bar No. 14108300
Law Office of Richard T. Miller
414 E. Wallace St.
San Saba, Texas 76877
325-372-4400
325-372-3645 Fax.
rtmiller@centex.net
Attorney for NSSWSC

P.U.C. DOCKET NO. 45283
SOAH DOCKET NO. 473-16-1834.WS
CERTIFICATE OF SERVICE

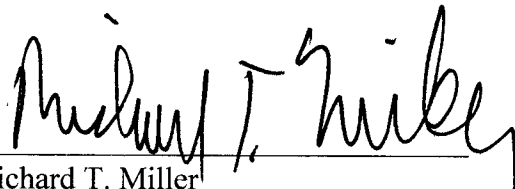
I certify that on May 6, 2016 a copy of this document was served upon the following parties of record via the means indicated:

Via facsimile

Sam Chang
State Bar No. 24078333
Attorney, Legal Division
Public Utility Commission of Texas 1701 N. Congress Avenue
P.O. Box 13326
Austin, Texas 78711-3326
(512) 936-7261
(512) 936-7268 (facsimile)
sam.chang@puc.texas.gov

Via U.S. Mail

Barbara Horn
Chairman, Ratepayers' Committee
7255 County Road 124
San Saba, TX 76877
325-372-4676



Richard T. Miller