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RECEIVED

APPLICATION OF THE CITY OF
SANGER AND BOLIVAR WATER
SUPPLY CORPORATION FOR
APPROVAL OF AN AGREEMENT
PURSUANT TO TEXAS WATER CODE
§ 13.248 AND TO AMEND
CERTIFICATES OF CONVENIENCE
AND NECESSITY IN DENTON
COUNTY

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BEFORE THE PUBLIC UTILITY

2016 APR 25 AM 10:59
PUBLIC UTILITY COMMISSION
FILING CLERK

COMMISSION OF TEXAS

SANGER HOLDINGS, LLC'S MOTION TO INTERVENE

TO THE PUBLIC UTILITY COMMISSION OF TEXAS:

COMES NOW, Sanger Holdings, LLC ("Sanger Holdings") and files this Motion to Intervene pursuant to PUC Proc. Rules 22.103 and 22.104 and in support thereof would respectfully show as follows:

Sanger Holdings respectfully requests to intervene as a party in the above-captioned proceeding pursuant to PUC Procedural Rules 22.103 and 22.104. This Motion to Intervene is filed within 45 days of the date the application was filed and therefore is timely.

Sanger Holdings has the right to intervene under PUC Procedural Rule 22.103(b) because it is the owner of the properties at issue and a party to the contract which forms the basis of this proceeding. Sanger Holdings has requested retail water service to its property by the City of Sanger, and, as such, it is a key party with justiciable interests which may be adversely affected by the outcome of this proceeding.

WHEREFORE, PREMISES CONSIDERED, Sanger Holdings, LLC respectfully requests that the Public Utility Commission grant its motion to intervene and permit it to take part in the above-captioned proceeding as a party.

Respectfully submitted,

JACKSON WALKER L.L.P.

By: Mallory Beck
Leonard Dougal - State Bar No. 06031400
Mallory Beck - State Bar No. 24073899
100 Congress, Suite 1100
Austin, Texas 78701
E: ldougal@jw.com
T: (512) 236 2233
F: (512) 391-2112

ATTORNEYS FOR SANGER HOLDINGS,
LLC

CERTIFICATE OF SERVICE

I hereby certify that the above and foregoing document was served as shown below on
this 25th day of April 2016:

City of Sanger
Attn: Mike Brice, City manager
502 Elm Street
Sanger, Texas 76266

Via U.S. First Class Mail

Bolivar Water Supply Corporation
Attn: Kevin Kemplin, President
4151 FM 455 W.
Sanger, Texas 76266

Via U.S. First Class Mail

Margaret Pemberton
Public Utility Commission of Texas
1701 N. Congress Avenue
Austin, Texas 78701

Via Hand Delivery

Mallory Beck
Mallory Beck