



Control Number: 46245



Item Number: 518

Addendum StartPage: 0

RECEIVED

SOAH DOCKET NO. 473-17-0119.WS  
PUC DOCKET NO. 46245

2016 OCT 11 PM 2:29

PUBLIC UTILITY COMMISSION

APPLICATION OF DOUBLE §  
DIAMOND UTILITY COMPANY, INC. §  
FOR WATER AND SEWER §  
RATE/TARIFF CHANGE §

BEFORE THE STATE OFFICE OF  
ADMINISTRATIVE HEARINGS

**MOTION TO INTERVENE OF  
WHITE BLUFF RATEPAYERS GROUP**

COMES NOW White Bluff Ratepayers Group ("WBRG") and file this Motion to Intervene and would respectfully show as follows:

**I. INTRODUCTION**

WBRG seeks to intervene, comment, and fully participate in this proceeding pursuant to the Texas Water Code and Sections 22.101 through 22.104 of the Commission's Procedural Rules. As set forth below, WBRG has a justiciable interest that may be adversely affected by the outcome of this proceeding.

**II. AUTHORIZED REPRESENTATIVE**

The name and address of the movant is:

White Bluff Ratepayers Group  
c/o John Bass  
P.O. Box 37  
Whitney, Texas 76692

WBRG's authorized representative for service of all pleadings and other documents in this docket and legal representative is:

Joe Freeland  
Mathews & Freeland, LLP  
8140 N. Mopac Expy  
Suite 2-260  
Austin, Texas 78759  
Telephone: (512) 404-7800  
Facsimile: (512) 703-2785  
Email: [jfreeland@mandf.com](mailto:jfreeland@mandf.com)

All pleadings, motions and other documents in this proceeding should be served on WBRG's authorized representative.

518

### III. TIMELINESS OF INTERVENTION

The deadline set for interventions in SOAH Order No. 1 in this docket is October 14, 2016. This motion is, therefore, timely filed.

### IV. JUSTICIABLE INTEREST

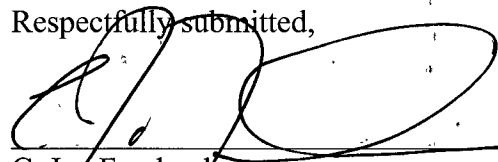
On August 1, 2016, Double Diamond Utility Company, Inc. ("Double Diamond") filed with the Commission an application for a rate/tariff change under Water CCN No. 12087 and Sewer CCN No. 20705 applicable to the Cliffs and the White Bluff subdivisions. WBRG is an unincorporated association of ratepayers of Double Diamond located in the White Bluff subdivision. Exhibit A lists the names and service addresses of WBRG's steering committee, each of whom are customers of Double Diamond.

Members of WBRG are directly and substantially affected by the issues raised and relief requested in this docket. WBRG has a clear justiciable interest that may be adversely affected by the outcome of this proceeding. Members of WBRG are customers of Double Diamond and will have to pay the rates proposed to be changed in this docket.

### V. PRAYER

WHEREFORE, PREMISES CONSIDERED, WBRG respectfully requests that this motion to intervene be granted, that WBRG be granted party status, and that WBRG receive any and all relief to which it shows that it is justly entitled.

Respectfully submitted,




---

C. Joe Freeland  
State Bar No. 07417500  
Mathews & Freeland, LLP  
8140 N. MoPac Expy  
Austin, Texas 78759  
Telephone (512) 404-7800  
Facsimile (512) 703-2785

ATTORNEYS FOR WHITE BLUFF  
RATEPAYERS GROUP

**CERTIFICATE OF SERVICE**

I certify that a copy of Joint Motion to Intervene was served on all parties of record in this proceeding on this 11th day of October 2016, by hand-delivery, facsimile, electronic mail, and/or First Class Mail.



C. Joe Freeland

**EXHIBIT A**  
**White Bluff Ratepayers Group**  
**Steering Committee**

**Name**

John Bass  
John Upchurch, III  
Marshall Snyder  
Scott Shelton

**Service Address**

1148 Overlook Dr., Whitney, Texas 76692  
21119 Trailwood Dr., Whitney, Texas 76692  
46008 White Bluff Dr., Whitney, Texas 76692  
15002 Golf Dr., Whitney, Texas 76692