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SOAH DOCKET NO. 473-17-2285.WS

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PUBLIC UTILITY COMMISSION
FILING CLERK

APPLICATION OF PK-RE
DEVELOPMENT COMPANY, INC.,
D/B/A GREENSHORES UTILITY
SERVICES AND D/B/A/OAK SHORES
WATER SYSTEM, FOR AUTHORITY TO
CHANGE RATES AND TARIFFS

BEFORE THE STATE OFFICE OF
ADMINISTRATIVE HEARINGS

MOTION TO INTERVENE

TO THE HONORABLE ADMINISTRATIVE LAW JUDGE:

In response to the Notice of Prehearing Conference regarding the above-referenced Application of PK-RE Development Company, Inc. (PK-RE or Applicant), Cynthia and Scott Smiley, as customers and ratepayers of the Applicant, respectfully request admission as parties to this case. As ratepayers and customers of the Applicant, we may be adversely affected by the outcome of this proceeding, as the Applicant has requested significant increases in the rates we pay for water service at our residence. Our residence is located within the Water Certificate of Convenience and Necessity held by this Applicant, and we rely upon the Applicant to provide reliable potable water at just and reasonable rates. We do not believe the proposed rate increases that are the subject of this Application are fair and reasonable, and we have serious concerns about the Applicant's ability to meet its obligations and assess rates in accordance with the Public Utilities Commission rules.

Please grant this Motion to Intervene so that we may join our neighbors and fellow customers and ratepayers in opposing the Applicant's inappropriate efforts to impose unlawful or inequitable rates upon its existing retail customers.

Requesting Party:

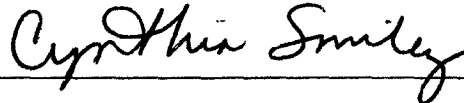
Cynthia and Scott Smiley
3401 Pearce Road
Austin, Texas 78730

Party's Representative for Participation in
Proceeding:

Cynthia Smiley
Smiley Law Firm, P.C.
6000 Shepherd Mountain Cove #2107
Austin, Texas 78730
Phone: 512-394-7121
FAX: 512-394-7145
Email: cindy@smileylawfirm.com

CERTIFICATE OF SERVICE

I certify that I have served or will serve a true and correct copy of the foregoing document via hand delivery, electronic mail, or U.S. Mail to all parties on this the 3rd day of March, 2017.

A handwritten signature in black ink, reading "Cynthia Smiley", is written over a horizontal line.

Cynthia Smiley