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2017 MAR 24 PM 2:42
PUBLIC UTILITY COMMISSION
FILING CLERK

March 24, 2017

VIA HAND DELIVERY

Public Utility Commission
Attn: Filing Clerk
1701 N. Congress Avenue, 8th Floor
Austin, Texas 78701

Re: PUC Docket No. 46333; SOAH Docket No. 473-17-2285.WS; Application of PK-RE Development Company, Inc. dba Greenshores Utility Services and dba Oak Shores Water System for Authority to Change Rates and Tariffs in Travis County; Before the State Office of Administrative Hearings

Dear Filing Clerk:

Greenshores on Lake Austin Property Owners' Association, Inc. filed its Opposition to Motion for Interim Rates yesterday. The attached Affidavit of Andrew J. Fossum was referenced as Exhibit 4 and was inadvertently missing from the pleading. I apologize for any inconvenience this may have caused.

If you have any questions or concerns, please contact me at your earliest convenience.

Sincerely,

THE CARLTON LAW FIRM, P.L.L.C.



John J. Carlton
Attorney for Greenshores on Lake Austin Property
Owners' Association, Inc.

Enclosure

cc: Parties

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SOAH DOCKET NO. 473-17-2285.WS
DOCKET NO. 46333

APPLICATION OF PK-RE	§	BEFORE THE STATE OFFICE
DEVELOPMENT COMPANY, INC.	§	
DBA GREENSHORES UTILITY	§	
SERVICES AND DBA OAK SHORES	§	OF
WATER SYSTEM FOR AUTHORITY	§	
TO CHANGE RATES AND TARIFFS	§	
IN TRAVIS COUNTY	§	ADMINISTRATIVE HEARINGSS

**AFFIDAVIT OF ANDREW J. FOSSUM IN SUPPORT OF
GREENSHORES ON LAKE AUSTIN PROPERTY
OWNERS' ASSOCIATION, INC.'S
OPPOSITION TO MOTION FOR INTERIM RATES**

I, Andrew J. Fossum, declare:


1. I am an attorney licensed to practice by the State Bar of Texas and the State Bar of California. I have personal knowledge of the matters stated herein and if called as a witness, I could and would testify competently thereto.

2. I attended a "town hall" meeting held by representatives of Undine, LLC on March 14, 2017. During that meeting, representatives from Undine indicated that they had performed due diligence on the PK-RE water and sewer system as part of their decision whether to purchase it. Also during the meeting, I raised the annual cost of the "pump-and-haul" expense to the utility, indicating that I believed it was at least \$180,000 annually. Representatives of Undine stated that the expense was closer to \$360,000.

3. I also attended the March 16, 2017 prehearing conference in the above-referenced proceeding. During a recess period, I raised the \$360,000 pump-and-haul annual expense figure provided by Undine. Mr. Eppright claimed that the annual expense was close to \$240,000 a year.

I declare under penalty of perjury under the laws of the State of Texas that the foregoing is true and correct.

Executed this 23rd day of March, 2017, in Austin, Texas.

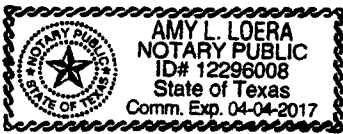


Andrew J. Fossum

THE STATE OF TEXAS §
COUNTY OF TRAVIS §

SUBSCRIBED AND SWORN TO BEFORE ME, this the 23rd day of March, 2017, to certify which witness my hand and seal of office.

(Seal)





Notary Public Signature