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PUC DOCKET NO. 46333

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 §

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PUBLIC UTILITY COMMISSION
OF TEXAS

UNDINE DEVELOPMENT LLC'S MOTION TO INTERVENE

COMES NOW, Undine Development LLC ("Undine") and files this Motion to Intervene in the above-styled and docketed proceeding pursuant to 16 Tex. Admin. Code §§ 22.101 and 22.104. In support of its Motion, Undine shows as follows:

1. On October 12, 2016, PK-RE Development Company, Inc. d/b/a Greenshores Utility Services and d/b/a Oak Shores Water System ("PK-RE") filed an application to change rates and tariffs in Travis County.

2. Undine has a justiciable interest in this proceeding, as PK-RE has also filed an Application for Sale, Transfer, or Merger ("STM") of a Retail Public Utility, stating its intent to sell all of the Water Systems under CCN No. 12407 and all of the Sewer Systems under CCN No. 20948, to Undine.

3. The STM application is pending in PUC Docket No. 46150.

4. Undine and PK-RE intend to jointly prosecute this rate application in order to have the rates in place prior to the closing of the above-mentioned STM application.

5. The contact information for Undine's authorized representatives in this matter is as follows:

Georgia N. Crump
Jamie L. Mauldin
Lloyd Gosselink Rochelle & Townsend, P.C.
816 Congress Avenue, Suite 1900
Austin, Texas 78701
(512) 322-5800
(512) 472-0532 (Fax)
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6. Undine requests that all correspondence, pleadings, briefs, requests for information, responses to requests for information, and other documents in this proceeding be served upon its authorized representatives.

WHEREFORE PREMISES CONSIDERED, Undine Development LLC requests that this Motion to Intervene be granted and any other relief to which it is justly entitled.

Respectfully submitted,

**LLOYD GOSSELINK ROCHELLE
& TOWNSEND, P.C.**

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(512) 322-5800

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GEORGIA N. CRUMP

State Bar No. 05185500

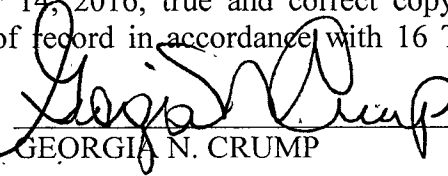
JAMIE L. MAULDIN

State Bar No. 24065694

ATTORNEYS FOR UNDINE DEVELOPMENT LLC

CERTIFICATE OF SERVICE

I hereby certify that on November 14, 2016, true and correct copy of the foregoing document has been served on all parties of record in accordance with 16 Tex. Admin. Code § 22.74.



GEORGIA N. CRUMP