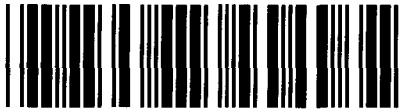




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DOCKET NO. 46436

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PETITION OF MANAGEMENT &  
TRAINING CORPORATION FOR  
REVIEW OF THE DECISION BY  
THE CITY OF OVERTON TO  
CHANGE RETAIL WATER AND  
SEWER RATES (BILLY MOORE  
CORRECTIONAL CENTER)

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PUBLIC UTILITY COMMISSION

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PUBLIC UTILITY COMMISSION  
OF TEXAS FILING CLERK

**MANAGEMENT & TRAINING CORPORATION'S REPLY TO THE CITY OF  
OVERTON'S SUR-REPLY TO MTC'S AMENDMENT TO ITS ORIGINAL PETITION  
AND REPLY TO THE CITY OF OVERTON'S RESPONSE TO PUBLIC UTILITY  
COMMISSION'S ORDER NO. 1**

COMES NOW, Management and Training Corporation ("MTC") and files this Reply to the City of Overton's Sur-Reply to MTC's Amendment to its Original Petition and Reply to the City of Overton's Response to Public Utility Commission's Order No. 1, pursuant to 16 TEX. ADMIN. CODE § 22.78(a) ("Reply"), and in support of the same would show as follows:


MTC filed its petition to appeal the City of Overton's ("City") newly adopted water and sewer rates for the Billy Moore Correctional Center ("Prison") pursuant to TEX. WATER CODE § 13.043(b) and 16 TEX. ADMIN. CODE § 22.41(c) ("Petition") and requested the Commission review the City's new rates to determine if the rates are just and reasonable. TEX. WATER CODE § 13.043(j), 16 TEX. ADMIN. CODE § 22.41(i). The points raised in the City's Sur-Reply do not impact MTC's right to request and receive a hearing on the City's newly adopted rates. Further, the City identifies several facts that may be more appropriate for a hearing on the City's rates but are irrelevant to MTC's right to appeal. In accordance with Commission's Order No. 1 and 16 TEX. ADMIN. CODE § 22.78(a), this Reply is timely filed.

Pursuant to TEX. WATER CODE § 13.043(b), MTC has the right to protest and appeal the decision of the City to increase the water and sewer rates for the Prison because the Prison consists

of 100% of the ratepayers whose rates have been changed and who are eligible to appeal by virtue of being outside the City's corporate jurisdictional limits. Arguments raised by the City its Sur-Reply may be germane to the Commission's determination of the City's rates as just and reasonable, but these issues should be addressed at a future hearing.

Respectfully submitted,

MCGINNIS LOCHRIDGE


By:   
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(512) 495-6000  
(512) 495-6093 (facsimile)

ATTORNEY FOR MANAGEMENT &  
TRAINING CORPORATION

**CERTIFICATE OF SERVICE**

I hereby certify that on this 9 day of November, 2016, a true and correct copy of the foregoing Management & Training Corporation's Reply to the City of Overton's Sur-Reply was sent by certified mail, return receipt requested and electronic mail to counsel of record at the following address:

G. Blake Thompson  
MANN, TINDEL, THOMPSON  
300 West Main Street  
Henderson, Texas 75652  
(903) 657-8540  
(903) 657-6003 (fax)

  
Morgan Johnson