

Control Number: 46452



Item Number: 12

Addendum StartPage: 0



1633 WILLIAMS DRIVE BUILDING 2, SUITE 200 GEORGETOWN, TEXAS 78628 PHONE (512) 930-1317 FAX (866) 929-1641 WWW.TXADMINLAW.COM

Email: arodriguez@txadminlaw.com

December 15, 2016 *

VIA Certified U.S. Mail; Return Receipt Requested #7015 1520 0001 4018 6951 an Hand Delivery

Filing Clerk
Public Utility Commission of Texas
1701 N. Congress Avenue
P.O. Box 13326
Austin, Texas 78711-3326

Re:

Application of Altoga Water Supply Corporation to Sell Water Facilities and to transfer CCN No. 12580 to North Collin Special Utility District in Collin County, Texas; PUC Docket No. 46452

To the Public Utility Commission of Texas:

The undersigned represents the City of Princeton, Texas ("City" or "Princeton") regarding the above-referenced application ("Application"). Please accept this letter as the City's notice of its opposition to the Application submitted by Altoga Water Supply Corporation ("Altoga"). **The City hereby requests a public contested case hearing on the Application.** In accordance with the published notice, the City provides the following information:

1. Your name, address, phone number:

The City may be notified of any developments in this case by providing notice to:

City of Princeton, Texas c/o Arturo D. Rodriguez, Jr. Russell & Rodriguez, LLP 1633 Williams Drive, Suite 200 Georgetown, Texas 78628 (512) 930-1317 (866) 929-1641 (Fax)

2. Applicant information: Application of Altoga Water Supply Corporation to Sell Water Facilities and to transfer CCN No. 12580 to North Collin Special Utility District in Collin County, Texas; PUC Docket No. 46452.

3. The statement, "I/we request a public hearing."

The City of Princeton requests a public hearing.

4. A brief description of how you or the persons you represent would be adversely affected by the granting of the application for a STM:

The City holds the water CCN immediately to the south of the Altoga water CCN. Further, the City holds the sewer CCN that covers approximately two-thirds of the Altoga water CCN. The City is concerned with the capability of North Collin SUD to provide continuous and adequate service to the Altoga area.

The area covered by the Altoga CCN is within the City's extraterritorial jurisdiction. The City continues to receive information requests for development within the Altoga CCN. Thus, the City will be serving the area with utilities in the future. It is vitally important to the City that a safe, reliable water supply serve the Altoga area to ensure that growth in the area continues and/or is not stymied by a water system that does not meet state minimum standards.

As the application will presumably necessitate an examination of the acquiring utility, the City is concerned with North Collin SUD's ability to provide the technical, managerial, and financial capability to provide continuous and adequate retail water service to the Altoga CCN area. The City believes that the City is in a better position to provide such a service to the area.

5. Your proposed adjustment to the application or CCN which would satisfy your concerns and cause you to withdraw your request for a hearing:

The City would rather serve the Altoga CCN area.

If we may be of further assistance or provide additional information, please contact me at the number above or 512-930-1317.

Sincerely,

Arturo D. Rodriguez, Jr.

Mr. Derek Borg