

Control Number: 46866



Item Number: 5

Addendum StartPage: 0

RECEIVED  
17 MAR -2 AM 11:50  
PUBLIC UTILITY COMMISSION  
FILING CLERK

**PUC DOCKET NO. 46866**

PETITION OF PATRICIA MILLER § PUBLIC UTILITY COMMISSION  
DEASON TO AMEND MARILEE §  
SPECIAL UTILITY DISTRICT'S §  
CERTIFICATE OF CONVENIENCE § OF TEXAS  
AND NECESSITY IN COLLIN §  
COUNTY BY EXPEDITED RELEASE §

**MARILEE SPECIAL UTILITY DISTRICT'S  
MOTION TO INTERVENE**

**COMES NOW**, Marilee Special Utility District ("Marilee SUD") and files this Motion to Intervene pursuant to 16 Tex. Admin Code §§ 22.101, 22.103, and 22.104. In support thereof, Marilee SUD would respectfully show as follows:


1. Marilee SUD respectfully requests to intervene as a party in this proceeding. As the Certificates of Convenience and Necessity ("CCN") holder, Marilee SUD is a necessary party to this proceeding and has the right to intervene as it has justiciable interests which may be adversely affected by the outcome of this proceeding.
2. Patricia Miller Deason filed a petition to amend Marilee SUD's CCN No. 10150 by expedited release on February 17, 2017 (the "Petition"), and Marilee SUD timely files this Motion to Intervene.
3. Marilee SUD has an interest in maintaining its CCN areas and protecting its investments in its infrastructure, and therefore Marilee SUD requests party status in order to allow it to continue to argue and respond to substantive issues raised in this proceeding.

**PRAYER**

**WHEREFORE, PREMISES CONSIDERED**, Marilee SUD requests that it be declared a party to this proceeding.

5

Respectfully submitted, .

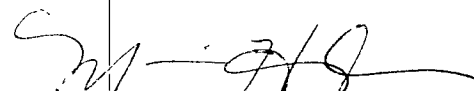
By:  \_\_\_\_\_

Maria Huynh  
State Bar No. 24086968  
John Rapier  
State Bar No. 16550500  
James W. Wilson  
State Bar No. 00791944  
Gay, McCall, Isaacks & Roberts, P.C.  
777 E. 15<sup>th</sup> Street  
Plano, Texas 75074  
Tel: (972) 424-8501  
Fax: (972) 423-3116  
jrapier@gmigr.com  
mhuynh@gmigr.com  
jwilson@gmigr.com  
Attorneys for Marilee Special Utility District

**CERTIFICATE OF SERVICE**

I certify that a true and correct copy of this document will be served on the following parties of record on March 1, 2017, in accordance with 16 TAC § 22.74.

Via electronic mail - mkoehne@coatsrose.com  
Mindy L. Koehne  
Attorney for Petitioner, Patricia Miller Deason  
Coats Rose, P.C.  
14755 Preston Road, Suite 600  
Dallas, Texas 75254

 \_\_\_\_\_  
Maria Huynh

