

Control Number: 46867



Item Number: 5

Addendum StartPage: 0

PUC DOCKET NO. 46867

PETITION OF CELINA PARTNERS,	PUBLIC UTILITY COMMISSION				
LTD. TO AMEND MARILEE SPECIAL UTILITY DISTRICT'S	§ 8	•	15 15 15	THR.	習
CERTIFICATE OF CONVENIENCE AND NECESSITY IN COLLIN	§	OF TEXAS	N LITE	2	E E
COUNTY BY EXPEDITED RELEASE	8		LESS.	PH 12	E
MARILEE SPECIAL UTILITY DISTRICT'S MOTION TO INTERVENE			#SSIC#	00	

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. Celina Partners, Ltd. 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.

Respectfully submitted,

Бу: _

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. 15th 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 ____, 2017, in accordance with 16 TAC § 22.74.

Via electronic mail - mkoehne@coatsrose.com

Mindy L. Koehne
Attorney for Petitioner, Celina Partners, Ltd.
Coats Rose, P.C.
14755 Preston Road, Suite 600
Dallas, Texas 75254

Maria Huynh