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APPLICATION OF SUBURBAN
UTILITY COMPANY, INC. FOR A
PASS-THROUGH RATE CHANGE

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§

BEFORE THE STATE OFFICE
OF PUBLIC UTILITY COMMISSION
FILING CLERK
ADMINISTRATIVE HEARINGS

TEMPORARY MANAGER'S MOTION TO INTERVENE

Pursuant to Public Utility Commission ("Commission") Procedural Rules 22.103 and 22.104, Quadvest LP, in its capacity as Temporary Manager of Suburban Utility, Inc., ("Temporary Manager") files this Motion to Intervene in the above-captioned proceeding and in support thereof respectfully shows as follows:

1. On March 27, 2017, the Executive Director of the Texas Commission on Environmental Quality issued an Emergency Order pursuant to Tex. Water Code chs. 5 and 13, Tex. Health & Safety Code ch. 341, and 30 Tex. Admin. Code chs. 35, 290, and 291, appointing Quadvest L.P. as Temporary Manager of the public water systems at issue in this docket.¹ Pursuant to Tex. Util. Code § 13.4132, Temporary Manager has the powers and duty to ensure the continued operation of the utility and the provision of continuous and adequate services to customers, including the authority to: (1) read meters; (2) bill for utility services; (3) collect revenues; (4) disburse funds; (5) access all system components; and (6) request rate increases. Because of the statutory authority and duties pursuant to statute, Temporary Manager has an interest in this proceeding.

2. The name, business address and telephone number of Temporary Manager is as follows:

¹ See Exhibit A, *Emergency Order Appointing a Temporary Manager of a Water Utility*, TCEQ Docket No. 2017-0392-UCR-E (March 27, 2017).

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Quadvest L.P.
P.O. Box 409
Tomball, Texas 77377
Telephone: (281) 356-5347

3. The name, business address and telephone number of the person(s) designated to represent Temporary Manager is:

Tammy Wavle Shea
State Bar No. 24008908
1221 McKinney, Suite 2900
Houston, Texas 77010
Telephone: (713) 750-3114
Facsimile: (832) 214-3905
Email: tshea@cozen.com

3. Temporary Manager hereby requests that the Commission and all parties to this proceeding serve copies of all filings and submissions, whether notices, correspondence, pleadings, briefs or other documents upon Temporary Manager's designated representatives.

4. FOR THESE REASONS, Temporary Manager requests that the Commission grant its motion to intervene, and grant all other relief, to which it is justly entitled.

Respectfully submitted,

COZEN O'CONNOR

By: Tammy Wavle Shea
Tammy Wavle-Shea *by permission*
State Bar No. 24008908 *Debra Ellis*
1221 McKinney, Suite 2900
Houston, Texas 77010
Telephone: (713) 750-3114
Facsimile: (832) 214-3905
Email: tshea@cozen.com

**ATTORNEY FOR TEMPORARY
MANAGER**

CERTIFICATE OF SERVICE

I hereby certify that on April 5, 2017, a true and correct copy of the foregoing document was served upon all parties of record by facsimile and/or First Class United States mail, postage prepaid.

Tammy Wavle Shea
Tammy Wavle Shea

by permission
Debra Ellis