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PUC DOCKET NO. 47273

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APPLICATION OF QUADVEST, L.P. §
FOR TEMPORARY RATES FOR §
SERVICES PROVIDED FOR A §
NONFUNCTIONAL UTILITY §

2017 JUL 24 PM 1: 35

BEFORE THE

PUBLIC UTILITY COMMISSION

OF TEXAS OLERK

CASTLEWOOD CUSTOMERS' MOTION TO INTERVENE

The Castlewood Civic Club and Steven Adame, Sr. and Connie Esparza ("Castlewood Customers"), pursuant to 16 Tex. Admin. Code §§ 22.102, 22.103(b), and 22.104, hereby file their Motion to Intervene and in support of their Motion show as follows:

- 1. On June 9, 2017, Quadvest L.P. filed an application for approval of temporary rates for services provided for a non-functioning utility under Texas Water Code § 13.046 ("TWC") and 16 Tex. Admin. Code § 24.147.
- 2. Castlewood Customers, with homes in the Castlewood Subdivision, are customers of Suburban Utility Company, Inc. ("Suburban"), which is under management by Quadvest, LP ("Quadvest"). Steven Adame and Connie Esparza receive service at the following addresses:

Steven Adame, Sr. 13514 Rockshire Drive Houston, Texas 77039

Connie Esparza 2823 Woodgate Street Houston, Texas 77039

3. Castlewood Customers may be adversely impacted by the relief requested by Quadvest. Thus, they will be impacted by the Commission's decisions regarding Quadvest's application. Therefore, Castlewood Customers have a justiciable interest in this proceeding.

4. Castlewood Customers' authorized representatives in this matter are:

Alfred R. Herrera
Brennan Foley
HERRERA & BOYLE, PLLC
816 Congress Avenue, Suite 1250
Austin, Texas 78701
512-474-1492 (Voice)
512-474-2507 (Fax)
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All pleadings and other documents should be served upon Castlewood Customers' authorized representatives.

For the above stated reasons, Castlewood Customers respectfully request that the Commission grant this Motion to Intervene and admit Castlewood Customers in this proceeding for all purposes, and request such other relief to which it may be justly entitled.

Respectfully submitted,

HERRERA & BOYLE, PLLC

816 Congress Avenue, Suite 1250

Austin, Texas 78701

(512) 474-1492 (voice) (512) 474-2507 (fax)

By:

Alfred R. Herrera

State Bar No. 09529600

Brennan Foley

State Bar No. 24055490

ATTORNEYS FOR CASTLEWOOD CUSTOMERS

CERTIFICATE OF SERVICE

I hereby certify that on this the 24th day of July 2017, a true and correct copy of the *Castlewood Customers' Motion to Intervene* was served upon all parties of record by facsimile and/or First-class United States mail, postage paid.

By:

Alfred K. Herrera