

Control Number: 47477



Item Number: 58

Addendum StartPage: 0

DOCKET NO. 47477

APPLICATION OF UNDINE TEXAS, \$
LLC AND CONSUMERS WATER, INC. \$
FOR SALE, TRANSFER, OR MERGER \$
OF FACILITIES AND CERTIFICATE \$
RIGHTS IN HARRIS AND \$
MONTGOMERY COUNTIES \$

NOTICE OF APPROVAL

This Notice of Approval addresses the application of Undine Texas, LLC and Consumers Water, Inc. for approval of Undine's purchase and transfer of a portion of the water service area rights and public water systems from Consumers under water certificate of convenience and necessity (CCN) number 10347 to Undine's CCN number 13260. Consumer's CCN number will be cancelled as a result of the transfer. The Commission approves the application.

I. Findings of Fact

The Commission makes the following findings of fact.

Applicants

- 1. Consumers is a domestic for-profit corporation registered with the Texas secretary of state under file number 800689270.
- 2. Consumers operates, maintains, and controls facilities for providing water service under CCN number 10347 in Harris and Montgomery counties.
- 3. Undine is a foreign limited-liability company registered with the Texas secretary of state under file number 802339329.
- 4. Undine operates, maintains, and controls facilities for providing water service under CCN number 13260 in Brazoria, Fort Bend, Harris, Matagorda, and Montgomery Counties.

Application

5. On August 7, 2017, Undine and Consumers requested approval of the sale of all of Consumers' public water systems and the transfer of the area certificated under Consumers' water CCN number 10347 to Undine.



- 6. On August 28, 2017, Undine filed an amendment to its application to remove a five-acre portion of the Spring Forest subdivision service area from the requested area.
- 7. On September 18, 2017, Undine filed a second amendment to its application to remove the approximately 100-acre Peach Creek Colony subdivision service area from the requested area.
- 8. On March 20, 2019, the Commission issued an order requesting clarification concerning the petition filed by Laurus Holdings, L.P., in Docket No. 48750¹ to remove properties located in the Spring Forest subdivision from the certificated service area of Consumers.
- 9. On March 25, 2019, Undine, Commission Staff, and Laurus Holdings filed joint comments clarifying that the Spring Forest subdivision properties that are the subject of the decertification petition in Docket No. 48750 should be excluded from the service area to be transferred from Consumers to Undine in this proceeding.
- 10. On April 3, 2019, Undine filed a third amendment to its application to remove the Spring Forest subdivision properties subject to the decertification proceeding in Docket No. 48750, which together cover a .81-acre area, from the service area to be transferred.
- 11. In their joint comments filed on March 25, 2019, Undine, Commission Staff, and Laurus Holdings stated that once the decertification request in Docket No. 48750 and the transfer in this proceeding are approved, Consumers will not retain any service area under CCN number 10347.
- 12. On April 25, 2019, the Commission issued a notice of approval in Docket No. 48750 removing the .81-acre tract of land from Consumers' CCN number 10347.
- 13. In Order No. 14 filed June 17, 2019, the ALJ requesting additional clarification concerning the status of the Peach Creek Colony subdivision and whether Consumers intended to keep the associated water service area under CCN 10347.
- 14. On June 18, 2019, Undine filed a response to Order No. 14, and in that response, stated that the public water system for the Peach Creek Colony subdivision was owned by Patton

¹ Petition of Laurus Holdings, L.P. and Medical Village of Cypress Creek, L.P. to Amend Consumers Water, Inc.'s Certificate of Convenience and Necessity in Montgomery County, Docket No. 48750, Petition (Oct. 9, 2018).

- Village Water Company under CCN number 11193, and the system and associated water service area was to be transferred in Docket No. 48448,² leaving no customers or water service area for Consumers to serve under CCN 10347.
- 15. On July 3, 2019, the Commission issued a notice of approval in Docket No. 48448, transferring the public water system for the Peach Creek Colony subdivision and associated water service area under CCN number 11193 from Patton Village Water Company to the City of Patton Village.
- 16. Undine and Consumers agreed to the sale of facilities and the transfer of a portion of service area held under Consumers' water CCN number 10347 to Undine.
- 17. After the clarifications and amendments to the original application, the sale will affect 1,746 existing customers. The following 15 non-contiguous service areas totaling 1,417 acres are to be transferred to Undine: (a) 117 acres within the Greengate Acres subdivision, public water system number 1010132; (b) 10.4 acres within the Highland Mobile Home subdivision, public water system number 1010285; (c) 52 acres within the Highland Ridge subdivision, public water system number 1010157; (d) 48 acres within the Huffman Heights subdivision, public water system number 1010700; (e) 55 acres in Joy Village, public water system number 1700021; (f) 40 acres in Lakewood Colony, public water system number 1700029; (g) 158 acres in Meadowlake Estates, public water system number 1010287; (h) 83 acres within the Peach Creek Oaks subdivision, public water system number 1700051; (i) 318 acres within the Pioneer Trails subdivision, public water system number 1700114; (j) 103 acres in Porter Terrace, public water system number 1700161; (k) 251 acres within the Spring Forest subdivision, public water system number 1700033; (1) 42 acres within the Springmont subdivision, public water system number 1010255; (m) 61 acres within the Tall Cedars Mobile Home subdivision, public water system number 1010219; (n) 21.5 acres within the Urban Acres subdivision, public water system number 1010252; and (o) an area of approximately 57 acres located approximately 32 miles north-northwest of downtown Houston, Texas in which there are currently no customers and no public water system.

² Application of Patton Village Water Company and the City of Patton Village for Sale, Transfer or Merger of Facilities and Certificate Rights Montgomery County, Docket No. 48448 (Jul. 3, 2019).

18. In Order No. 2 issued on September 11, 2017, the administrative law judge (ALJ) found the application administratively complete.

Notice

- 19. On August 7, 2017, Undine filed a motion for waiver of notice and hearing.
- 20. Notice of the application appeared in the August 18, 2017 issue of the *Texas Register*.
- 21. In Order No. 2 issued on September 11, 2017, the ALJ denied Undine's motion for waiver of notice and instructed Undine to file notice to current customers.
- 22. On September 26, 2017, Undine mailed notice to the affected customers of Consumers.
- 23. On September 27, 2017, Undine filed the affidavit of Carey Thomas, Senior Vice President of Undine, attesting to the completion of notice to current customers on September 26, 2017.
- 24. In Order No. 4 issued on October 11, 2017, the ALJ found notice sufficient.
- 25. On October 12, 2017, Undine filed the supplemental affidavit of Mr. Thomas attesting that notice was provided to the Harris County Judge and Montgomery County Judge on October 11, 2017.
- 26. In Order No. 5 issued on October 19, 2017, the ALJ deemed the supplemental notice sufficient.

<u>Sale</u>

- 27. In Order No. 6 issued December 4, 2017, the ALJ authorized the sale to proceed and ordered the applicants to file proof that the sale had been completed and that customer deposits had been addressed.
- 28. On July 16, 2018, Undine filed notice that the sale had closed on July 2, 2018 and attached a bill of sale and the affidavit of Mr. Thomas, who attested that the customer deposits held by Consumers had been transferred to Undine on July 2, 2018. Undine filed a detailed list of customer deposits under seal.
- 29. In Order No. 8 issued August 2, 2018, the ALJ found that the closing documents were sufficient and that the outstanding customer deposits were addressed.

Evidentiary Record

- 30. On November 30, 2018, the parties filed a joint motion to admit evidence into the record.
- 31. In Order No. 11 issued on January 3, 2019, the ALJ admitted the following evidence into the record: (a) the application of Undine and Consumers and all attachments filed on August 7, 2017; (b) the applicants' supplemental filing to the application filed on August 11, 2017; (c) the applicants' first errata to the application filed on August 28, 2017; (d) the applicants' second errata to the application filed on September 18, 2017; (e) the applicants' affidavit and proof of notice filed on September 27, 2017; (f) the applicants' supplemental affidavit and proof of notice filed on October 12, 2017; (g) Commission Staff's recommendation on approval of sale and all attachments filed on November 29, 2017; (h) the applicants' notice of proof that the transaction has been completed and customer deposits have been properly addressed filed on July 16, 2018; (i) Commission Staff's recommendation on sufficiency of closing documents filed on July 30, 2018; (j) Undine's revised consent form to the final maps and certificate filed on September 28, 2018; (k) the maps and certificate filed on October 3, 2018.
- 32. It is appropriate to treat Undine's third amendment to its application, filed on April 3, 2019, as a request to admit the third amendment and its attachments into the evidentiary record.
- 33. On June 7, 2019, the parties filed a joint motion to admit additional evidence into the record.
- 34. In Order No. 13 issued on June 11, 2019, the ALJ admitted Undine's revised map and consent form, both filed on May 30, 2019, into the evidentiary record.

<u>System Compliance—Texas Water Code (TWC) § 13.301(e)(3)(A); 16 Texas Administrative</u> Code (TAC) §§ 24.227(a), 24.239(j)(3)(A), (j)(5)(A)

- 35. Undine has not been subject to any enforcement action by the Commission, the TCEQ, the Texas Department of Health, the Office of the Attorney General, or the United States Environmental Protection Agency.
- 36. There is no evidence in the record regarding Consumers' history of noncompliance or any enforcement action by the Commission, the TCEQ, the Texas Department of Health, the Office of the Attorney General, or the United States Environmental Protection Agency.

Adequacy of Existing Service—TWC § 13.246(c)(1); 16 TAC §§ 24.227(d)(1), 24.239(j)(5)(B)

- 37. The requested areas include 14 TCEQ-approved PWSs, and one area that has neither current customers nor public water system.
- 38. The 14 public water systems to be transferred have no active water violations, but each one will require capital improvements to maintain compliance with TCEQ rules.
- 39. The public will be better served through Undine's ownership of public water systems due to improvements in customer service and operations and maintenance in the requested areas.

Need for Additional Service—TWC § 13.246(c)(2); 16 TAC §§ 24.227(d)(2), 24.239(j)(5)(C)

- 40. No new requests for service have been received within the requested areas and Undine did not request to add any uncertificated areas.
- 41. Consumers' current customers in the requested areas have a need for water service.

Effect of Approving the Transaction and Granting the Amendment—TWC § 13.246(c)(3); 16 TAC §§ 24.227(d)(3), 24.239(j)(5)(D)

- 42. There are multiple utilities, cities, or political subdivisions providing water service within two miles of one or more of the requested areas.
- 43. There are no other retail public utilities providing water service that would be affected by the proposed transactions.
- 44. Undine intends to integrate the acquired systems into its existing public water systems, and thereby raise the standards for quality customer service in the requested areas.
- 45. As a result of the transaction, the customers in the requested area will benefit from a stable water supply from a public water system that is professionally operated and maintained.
- 46. The water rates in the requested areas will not change due to the transfers.

Ability to Serve: Managerial and Technical—TWC §§ 13.241(a), 13.246(c)(4), 13.301(b), (e)(2); 16 TAC §§ 24.227(a), (d)(4), 24.239(g), (j)(5)(E)

- 47. Undine has management capable of running the water systems within the requested areas and providing service that is continuous and adequate.
- 48. Undine's management collectively possesses lengthy experience in utility-related accounting and project development.

49. Undine employs 16 operators with a cumulative 33 water and wastewater operation licenses.

Ability to Serve: Financial Ability and Stability—TWC §§ 13.241(a), 13.246(c)(6), 13.301(b); 16 TAC §§ 24.11(e), 24.227(a), (d)(6), 24.239(g), (j)(5)(G)

- 50. Undine has the financial ability through customer collections and infusions of capital from lenders to make all necessary repairs and improvements to the public water systems, as needed, to keep them in full compliance with all TCEQ and Commission regulations.
- 51. Undine is capable of providing continuous and adequate service in the requested areas.
- 52. Undine has demonstrated adequate financial and managerial capability to provide service to the requested areas.
- 53. The consolidated financial statements for Undine's affiliate, Undine Group, LLC, show that Undine possesses a debt-to-equity ratio of less than one.
- 54. Undine's net income from continuing operations is projected to be positive for the next six years, with no operations or maintenance shortages expected.

Financial Assurance—TWC §§ 13.246(d), 13.301(c); 16 TAC §§ 24.227(e), 24.239(h)

55. There is no need to require Undine to provide a bond or other financial assurance to ensure continuous and adequate service in the requested areas.

Feasibility of Obtaining Service from Adjacent Retail Public Utility—TWC §§ 13.246(c)(5); 16 TAC §§ 24.227(d)(5), 24.239(j)(5)(F)

56. Following the transfer, water service to the requested areas will be provided by Undine using existing infrastructure; therefore, it is not feasible to obtain service from an adjacent retail public utility.

Regionalization or Consolidation—TWC §§ 13.241(d); 16 TAC § 24.227(b)

57. Since Undine does not anticipate building any new facilities to continue serving the requested areas, regionalization or consolidation is not a factor.

Environmental Integrity—TWC § 13.246(c)(7); 16 TAC §§ 24.227(d)(7), 24.239(j)(5)(H)

58. The requested areas will be served with existing infrastructure and the transfer should have minimal effect on environmental integrity.

<u>Improvement of Service or Lowering Cost to Consumers—TWC § 13.246(c)(8); 16 TAC §§ 24.227(d)(8), 24.239(j)(5)(I)</u>

- 59. Undine intends to improve customer service and communications with customers in the requested areas.
- 60. Undine intends to improve regulatory compliance issues in the requested areas.
- 61. Rates for customers in the requested areas will not change as a result of the sale of Consumers' water systems.

Effect on Land—TWC § 13.246(c)(9); 16 TAC § 24.227(d)(9)

62. The requested areas are already being served; therefore, the transfer will have a minimal effect on the land.

Tariffs and Maps

- 63. On August 28, 2018, Commission Staff emailed to Undine and Consumers proposed maps, tariffs, and certificates related to this docket and Docket Nos. 47396³ and 47441.⁴
- 64. On September 26, 2018, Undine filed a consent form concurring with the proposed maps and certificates, as prepared by Commission Staff.
- On September 28, 2018, Undine filed a revised consent form concurring with the proposed maps, tariffs, and certificates, as prepared by Commission Staff.
- On October 3, 2018, the proposed maps, certificates, and tariffs were filed as an attachment to the joint motion for adoption of a notice of approval.
- 67. In Order No. 12 issued on May 21, 2019, the ALJ required Commission Staff to submit a revised map reflecting the removal of the .81-acre area from the service area to be transferred. The ALJ also ordered Undine to file a consent form concurring with the revised map.
- 68. On May 29, 2019, Commission Staff emailed the revised map to Undine.
- 69. On May 30, 2019, Undine filed a consent form concurring with the revised map.

³ Application of Undine Texas, LLC and Suburban Utility Company for Sale, Transfer or Merger of Facilities and Certificate Rights in Harris County, Docket No. 47396, Notice of Approval (Dec. 21, 2018).

⁴ Application of Community Utility Company and Undine Texas, LLC for Sale, Transfer or Merger of Facilities and Certificate Rights in Harris and Montgomery Counties, Docket No. 47441 (pending).

Certificates

- 70. Consumers has sold all of its public water systems and will no longer provide water service.
- 71. Because Consumers will have no customers and no need for any water service area, CCN number 10347 should be cancelled.

Informal Disposition

- 72. More than 15 days have passed since the completion of notice provided in this docket.
- 73. No person filed a protest or motion to intervene.
- 74. Consumers, Undine, and Commission Staff are the only parties to this proceeding.
- 75. No party requested a hearing and no hearing is needed.
- 76. Commission Staff recommended approval of the application.
- 77. This decision is not adverse to any party.

II. Conclusions of Law

The Commission makes the following conclusions of law.

- 1. The Commission has jurisdiction over this proceeding under TWC §§ 13.041, 13.241, 13.242, 13.244, 13.246, 13.251, 13.254, and 13.301.
- 2. Undine is a retail public utility as defined by TWC § 13.002(19) and 16 TAC § 24.3(59).
- 3. Public notice of the application was provided as required by TWC § 13.301 and 16 TAC § 24.239.
- 4. The Commission processed the application as required by the TWC, the Administrative Procedure Act,⁵ and Commission rules.
- 5. Undine and Consumers completed the sale within the time required by 16 TAC § 24.239(o).
- 6. Undine and Consumers complied with the requirements of 16 TAC § 24.239(m) with respect to customer deposits.

⁵ Tex. Gov't Code ch. 2001.

- 7. After consideration of the factors in TWC § 13.246(c), Undine has demonstrated adequate financial, managerial, and technical capability for providing adequate and continuous service to the requested areas. TWC § 13.301(b).
- 8. Undine and Consumers have demonstrated that the sale and transfer of the public water systems and the associated water service areas of CCN number 10347 from Consumers to Undine's CCN number 13260 will serve the public interest and is necessary for the service, accommodation, convenience, or safety of the public. TWC § 13.301(d), (e).
- 9. Undine must record a certified copy of the CCN granted and maps approved by this Notice of Approval, along with a boundary description of the requested areas, in the real property records of Harris and Montgomery counties within 31 days of receiving this Notice of Approval and submit to the Commission evidence of the recording. TWC § 13.257(r), (s).
- 10. The requirements for informal disposition under 16 TAC § 22.35 have been met in this proceeding.

III. Ordering Paragraphs

In accordance with these findings of fact and conclusions of law, the Commission issues the following orders.

- 1. The Commission approves Undine's purchase of Consumers' public water systems and the transfer of Consumer's associated water service areas under CCN number 10347, as identified in this Notice of Approval, to Undine.
- 2. The Commission amends Undine's CCN number 13260 to include the areas described by this Notice of Approval and shown on the attached maps.
- 3. The Commission cancels Consumers' CCN number 10347.
- 4. The Commission approves the tariff as filed on October 3, 2018.
- 5. The Commission admits Undine's third amendment to its application and accompanying attachments, filed on April 3, 2019, into the evidentiary record.
- 6. Within ten days of the date of this Notice of Approval, Commission Staff must provide a clean copy of the tariff approved by this Notice of Approval to central records to be marked *Approved* and filed in the Commission's tariff books.

- 7. Undine must provide continuous and adequate water service to every customer and applicant for service within the service area for water CCN number 13260 in accordance with Undine's water tariff.
- 8. Undine must comply with the recording requirements in TWC § 13.257(r) and (s) for the areas in Harris and Montgomery Counties affected by the application.
- 9. Undine must submit to the Commission evidence of the recording no later than 45 days after receipt of this Notice of Approval.
- 10. The Commission denies all other motions and any other requests for general or specific relief, if not expressly granted.

Signed at Austin, Texas the 25th day of July 2019.

PUBLIC UTILITY COMMISSION OF TEXAS

CHRISTOPHER OAKLEY ADMINISTRATIVE LAW JUDGE

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Public Utility Commission of Texas

By These Presents Be It Known To All That Undine Texas, LLC

having obtained certification to provide water utility service for the convenience and necessity of the public, and it having been determined by this Commission that the public convenience and necessity would in fact be advanced by the provision of such service, Undine Texas, LLC, is entitled to this

Certificate of Convenience and Necessity No. 13260

to provide continuous and adequate water utility service to that service area or those service areas in Brazoria, Fort Bend, Harris, Matagorda and Montgomery Counties as by final Order or Orders duly entered by this Commission, which Order or Orders resulting from Docket No. 47396, 47441 and 47477 are on file at the Commission offices in Austin, Texas; and are a matter of official record available for public inspection; and be it known further that these presents do evidence the authority and the duty of Undine Texas, LLC to provide such utility service in accordance with the laws of this State and Rules of this Commission, subject only to any power and responsibility of this Commission to revoke or amend this Certificate in whole or in part upon a subsequent showing that the public convenience and necessity would be better served thereby.

Issued at Austin, Texas, the 25th day of July 2019.

Transferred a Portion of Consumers Water, Inc., CCN No. 10347 in Harris County





Public Utility Commission of Texas 1701 N. Congress Ave Austin, TX 78701

Water CCN

13260 - Undine Texas LLC



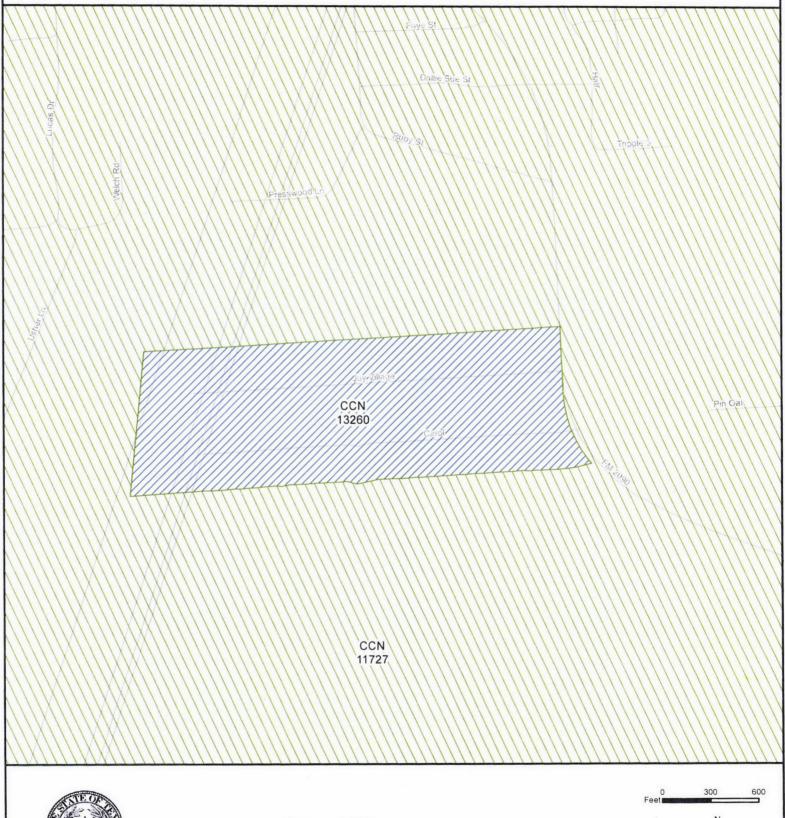
13203 - Aqua Texas INC



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Map by: Komal Patel Date created: August 27, 2018 Project Path: n:\finalmapping\ 47477UndineTXMap1.mxd Map 1 of 13

Transferred a Portion of Consumers Water, Inc., CCN No. 10347 in Montgomery County





Public Utility Commission of Texas 1701 N. Congress Ave Austin, TX 78701

Water CCN



13260 - Undine Texas LLC



11727 - City of Splendora

Map by: Komal Patel Date created: August 27, 2018 Project Path: n:\finalmapping\
47477UndineTXMap2.mxd

Map 2 of 13

Transferred a Portion of Consumers Water, Inc., CCN No. 10347 in Harris County





Public Utility Commission of Texas 1701 N. Congress Ave Austin, TX 78701

Water CCN

13260 - Undine Texas LLC

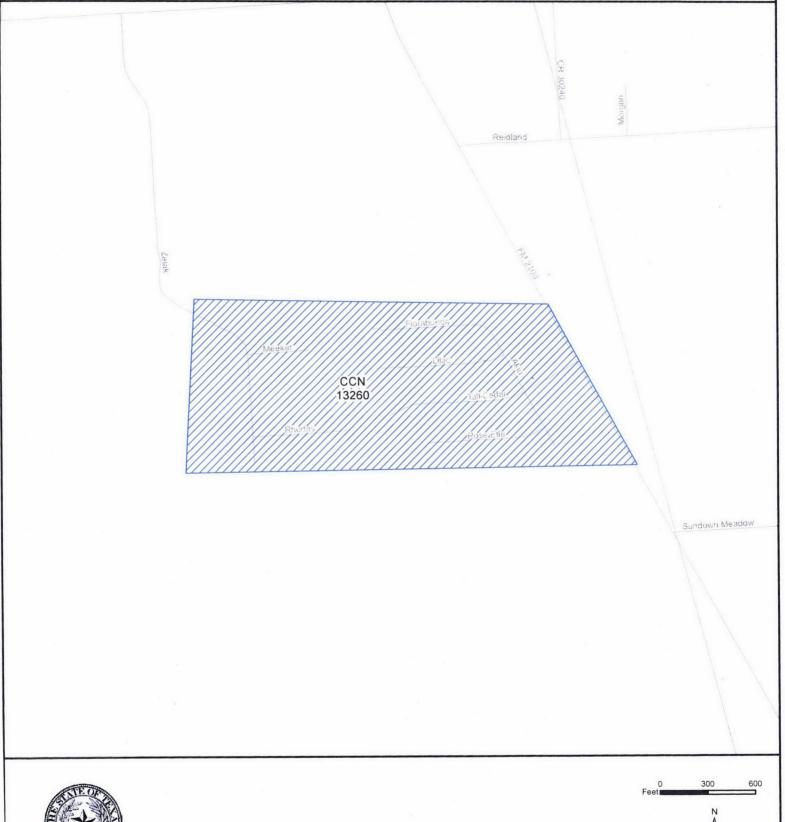
10863 - Dove Meadows MUD

Peet 800 1,600

Map by: Komal Patel Date created: August 27, 2018 Project Path: n:\finalmapping\ 47477UndineTXMap3.mxd Map 3 of 13

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Transferred a Portion of Consumers Water, Inc., CCN No. 10347 in Harris County





Public Utility Commission of Texas 1701 N. Congress Ave Austin, TX 78701

Water CCN



13260 - Undine Texas LLC

Map by: Komal Patel Date created: August 27, 2018 Project Path: n:\finalmapping\ 47477UndineTXMap4.mxd Map 4 of 13

Transferred a Portion of Consumers Water, Inc., CCN No. 10347 in Montgomery County





Public Utility Commission of Texas 1701 N. Congress Ave Austin, TX 78701

Water CCN



13260 - Undine Texas LLC



12312 - Town of Woodloch



Map by: Komal Patel Date created: August 27, 2018 Project Path: n:\finalmapping\ 47477UndineTXMap5.mxd Map 5 of 13

Transferred a Portion of Consumers Water, Inc., CCN No. 10347 in Montgomery County





Public Utility Commission of Texas 1701 N. Congress Ave Austin, TX 78701

Water CCN

13260 - Undine Texas LLC



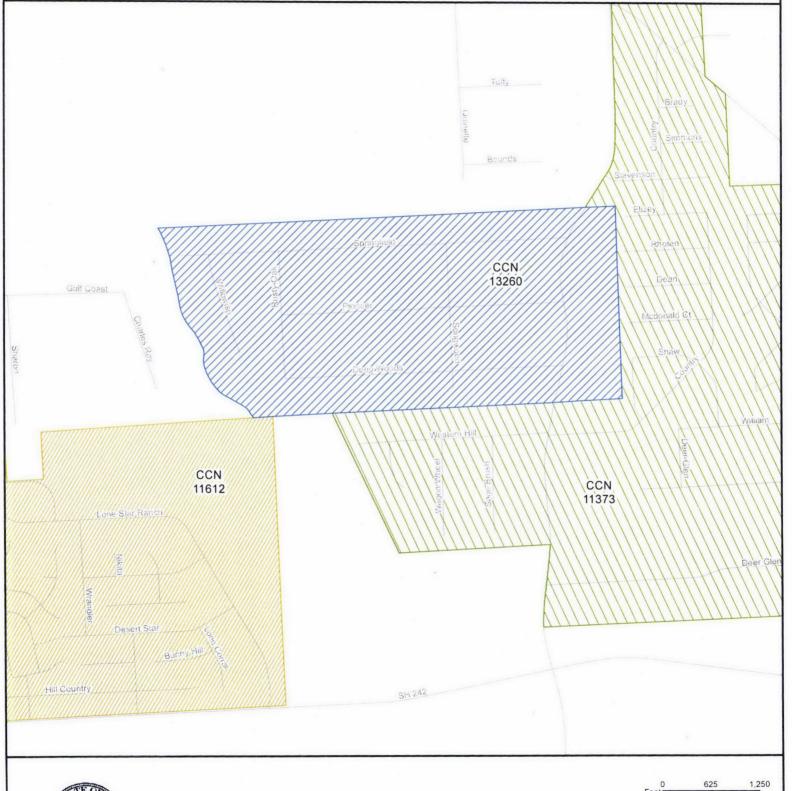
11969 - New Caney MUD





Map by: Komal Patel Date created: August 27, 2018 Project Path: n:\finalmapping\ 47477UndineTXMap6.mxd Map 6 of 13

Undine Texas, LLC Portion of Water CCN No. 13260 PUC Docket No. 47477 Transferred a Portion of Consumers Water, Inc., CCN No. 10347 in Montgomery County





Public Utility Commission of Texas 1701 N. Congress Ave Austin, TX 78701

Water CCN

13260 - Undine Texas LLC

11373 - Crystal Springs Water Co Inc

11612 - Quadvest LP

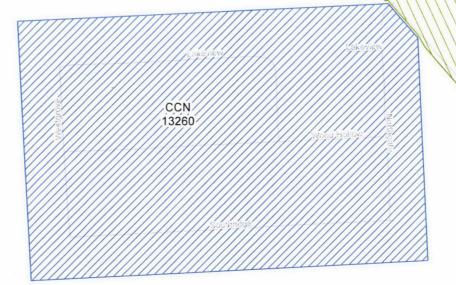




Map by: Komal Patel Date created: August 27, 2018 Project Path: n:\finalmapping\ 47477UndineTXMap7.mxd Map 7 of 13

Transferred a Portion of Consumers Water, Inc., CCN No. 10347 in Montgomery County

CCN 11473



CCN 11473



Public Utility Commission of Texas 1701 N. Congress Ave Austin, TX 78701 **Water CCN**

13260 - Undine Texas LLC



11473 - Porter SUD





Map by: Komal Patel Date created: August 27, 2018 Project Path: n:\finalmapping\ 47477UndineTXMap8.mxd Map 8 of 13

Transferred a Portion of Consumers Water, Inc., CCN No. 10347 in Montgomery County





Public Utility Commission of Texas 1701 N. Congress Ave Austin, TX 78701

Water CCN



13260 - Undine Texas LLC



11473 - Porter SUD





Map by: Komal Patel Date created: August 27, 2018 Project Path: n:\finalmapping\ 47477UndineTXMap9.mxd Map 9 of 13

Transferred a Portion of Consumers Water, Inc., CCN No. 10347 in Harris County





Public Utility Commission of Texas 1701 N. Congress Ave Austin, TX 78701

Water CCN

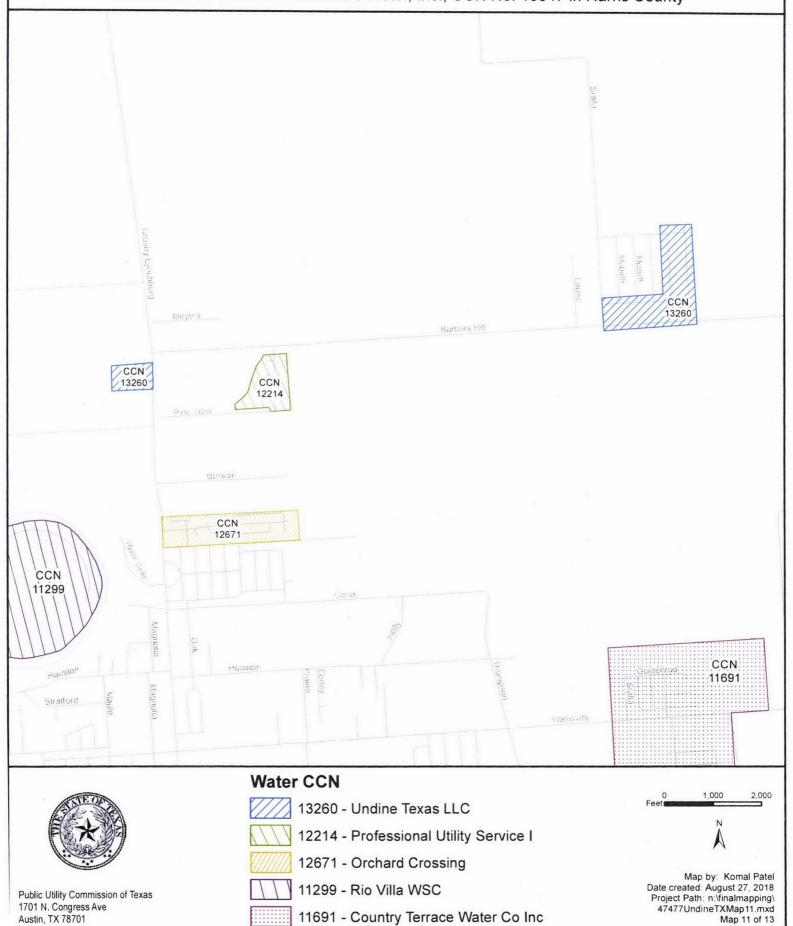
13260 - Undine Texas LLC

13026 - Tidwell Wastewater Utility LLC

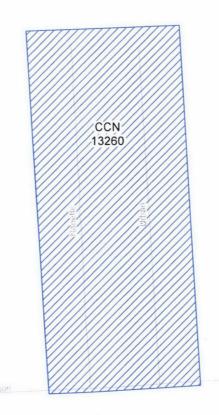


Map by: Komal Patel Date created: August 27, 2018 Project Path: n:\finalmapping\ 47477UndineTXMap10.mxd Map 10 of 13

Undine Texas, LLC Portion of Water CCN No. 13260 PUC Docket No. 47477 Transferred a Portion of Consumers Water, Inc., CCN No. 10347 in Harris County



Transferred a Portion of Consumers Water, Inc., CCN No. 10347 in Harris County





Public Utility Commission of Texas 1701 N. Congress Ave Austin, TX 78701 **Water CCN**



13260 - Undine Texas LLC





CR 3843

CR 3844

Map by: Komal Patel Date created: August 27, 2018 Project Path: n:\finalmapping\ 47477UndineTXMap12.mxd Map 12 of 13

Transferred a Portion of Consumers Water, Inc., CCN No. 10347 in Montgomery County





Public Utility Commission of Texas 1701 N. Congress Ave Austin, TX 78701

Water CCN



13260 - Undine Texas LLC



13203 - Aqua Texas Inc



Map by: Komal Patel Date UPDATED: May 28, 2019 Project Path: n:\finalmapping\ UPDATED 47477UndineTXMap13.mxd Map 13 of 13