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LANDOWNERS' PETITION TO §
 AMEND MANVILLE WATER SUPPLY §
 CORPORATION'S CERTIFICATE OF §
 CONVENIENCE AND NECESSITY IN §
 TRAVIS COUNTY BY EXPEDITED §
 RELEASE §

PUBLIC UTILITY COMMISSION
 OF TEXAS

**LANDOWNERS' REPLY TO MANVILLE'S RESPONSE AND
 COMMISSION STAFF'S RECOMMENDATION ON FINAL DISPOSITION**

COMES NOW, landowners Kimbro Road Estates, LP, Sky Village Kimbro Estates, LLC, Alma Juanita Champion Meier, William Clark Meier, and Carolyn Juanita Fauber (jointly, "Landowners") and files this, their Reply to Manville's Response and Commission Staff's Recommendation on Final Disposition ("Reply"), and in support thereof, respectfully shows as follows:

I. Background

On August 15, 2017, Landowners filed with the Public Utility Commission of Texas ("Commission") a petition for expedited release ("Petition") of three parcels of land that total approximately 538.368 acres from Manville Water Supply Corporation's ("Manville") Water Certificate of Convenience and Necessity ("CCN") No. 11144. Manville intervened in this matter on October 12, 2017, which intervention was granted by the Administrative Law Judge ("ALJ") on October 20, 2017. On November 16, 2017, the ALJ issued Order No. 4 finding the Landowners' Petition administratively complete and requiring that Manville file a response to the Landowners' administratively complete Petition by November 28, 2017, and that Commission Staff file their recommendation on final disposition by December 5, 2017. Order No. 4 also required that Landowners file this Reply by December 12, 2017. This Reply is timely filed.

II. Reply to Manville's Response

As required by Order No. 4, Manville filed its response to the Landowners' administratively complete Petition ("Response") on November 27, 2017. In its Response, Manville states that in order to grant Landowners' Petition, the Commission is required to find that an alternate service provider is capable of servicing the area to be released. Response at 3. Manville's contention would be correct if Landowners were seeking expedited release pursuant to TEX. WATER CODE § 13.251(a-1) or 16 TEX. ADMIN. CODE § 24.113(k). But Landowners sought

streamlined expedited release under TEX. WATER CODE § 13.251(a-5) and 16 TEX. ADMIN. CODE § 24.113(l), neither of which requires identifying an alternate service provider.

Manville's Response lists several concerns with respect to certain costs associated with the area to be released. Landowners neither admit nor deny that any of Manville's property will be rendered useless or valueless, but Landowners have agreed pursuant to 16 TEX. ADMIN. CODE §§ 24.113(l)(5) and (n)(4) that Manville will be compensated in the amount of \$181,500, which amount shall be paid to Manville on terms and at times to be decided at a future date.

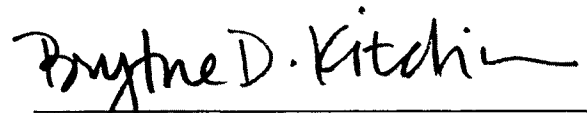
III. Reply to Commission Staff's Recommendation

As required by Order No. 4, Commission Staff filed its final recommendation ("Recommendation") on December 5, 2017. Landowners agree with and have no objection to Staff's Recommendation, except regarding the existence of and reasonable compensation for any useless or valueless property as discussed in Section II, above.

IV. Conclusion

Landowners respectfully request that their Petition be approved in accordance with Staff's Recommendation, except regarding the amount of reasonable compensation for all of Manville's property rendered useless or valueless by Landowners' Petition, which amount should be set at \$181,500 as agreed by the parties.

Respectfully submitted,

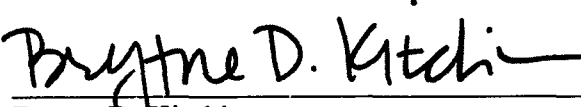


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ATTORNEYS FOR LANDOWNERS

CERTIFICATE OF SERVICE

I hereby certify that a copy of this document was served on all parties of record on this, the 12th day of December, 2017, in accordance with 16 TEX. ADMIN. CODE § 22.74.


Brytne D. Kitchin