



Control Number: 47518



Item Number: 8

Addendum StartPage: 0

Docket No. 47518

RECEIVED

2017 OCT 12 PM 12:15

PUBLIC UTILITY COMMISSION
FILING CLERK

LANDOWNERS' PETITION TO AMEND	\$	PUBLIC UTILITY COMMISSION
MANVILLE WATER SUPPLY CORPORATION'S	\$	
CERTIFICATE OF CONVENIENCE AND NECESSITY	\$	OF TEXAS
IN TRAVIS COUNTY BY EXPEDITED RELEASE	\$	

GENERAL APPEARANCE AND PETITION IN INTERVENTION
OF MANVILLE WATER SUPPLY CORPORATION

Comes Now, Manville Water Supply Corporation, a nonprofit member owned water supply corporation and holder of the Certificate of Convenience and Necessity sought herein to be in part decertificated by Expedited Release, and enters a General Appearance in this cause, and would respectfully show the Commission the following:

1. Manville Water Supply Corporation (hereinafter "Manville") can offer no legitimate reason why the Expedited Release should not be granted, given that the operative statute offers no defenses.
2. Manville stands ready to provide adequate and continuous service to the tracts of land sought to be released, but has never received a formal request for service.
3. In the years prior to this Petition for Expedited Release, Manville has expended substantial funds to prepare for service to the area in question, including the installation of infrastructure in anticipation of a request for service to the properties, and entry into a wholesale supply contract to provide water specifically dedicated to the properties in question, all in anticipation of a request for service. Manville's investment will in large part be rendered useless, to the fiscal detriment of Manville and its ratepayers.
4. On information and belief, no other water utility has committed to providing alternative service to the properties sought to be released.

8

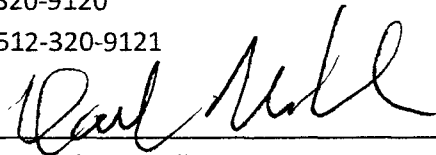
5. Manville requests that its right to an award of compensation be protected, and that upon final hearing Manville be awarded reasonable compensation for its lost service area and the resulting collateral damages.

WHEREFORE, premises considered, Manville Water Supply Corporations prays that it be granted Intervenor status for the purpose of establishing its right to reasonable compensation for its lost service area, that alternative retail service by other utilities, if any should appear, be barred pending payment of said compensation, and for such other relief at law or in equity to which Manville Water Supply Corporation might show itself entitled.

Respectfully submitted,

MOELLER LAW OFFICES
700 Lavaca, Suite 1400
Austin, Texas 78701
512-320-9120
Fax: 512-320-9121

By: _____



Karl H. Moeller SB#14247000

ATTORNEYS FOR MANVILLE WSC

Certificate of Service

A true copy of the foregoing has been served on all parties of record by fax and first class US Mail, postage prepaid, this 12 day of October, 2017.

