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PETITION OF WYNNE/JACKSON, §
INC. TO AMEND MARKOUT WATER §
SUPPLY CORPORATION'S §
CERTIFICATE OF CONVENIENCE AND §
NECESSITY IN KAUFMAN §
COUNTY BY EXPEDITED RELEASE §

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PUBLIC UTILITY COMMISSION
PUBLIC UTILITY COMMISSION
OF TEXAS

MARKOUT WATER SUPPLY CORPORATION'S MOTION TO INTERVENE

TO THE PUBLIC UTILITY COMMISSION OF TEXAS:

COMES NOW, Markout Water Supply Corporation ("Markout WSC") and files this Motion to Intervene pursuant to 16 Tex. Admin. Code §§ 22.101, 22.103, and 22.104. In support thereof, Markout WSC would respectfully show as follows:

1. Markout WSC respectfully requests to intervene as a party in this proceeding. As Certificate of Convenience and Necessity ("CCN") holder, Markout WSC is a necessary party to this proceeding and has the right to intervene as it has justiciable interests which may be adversely affected by the outcome of this proceeding.

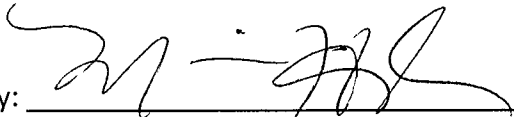
2. Wynne/Jackson, Inc. filed a petition to amend Markout WSC's CCN No. 10846 by expedited release on October 16, 2017 (the "Petition"), and Markout WSC timely files this Motion to Intervene.

3. Markout WSC has an interest in maintaining its CCN areas and protecting its investments in its infrastructure, and therefore Markout WSC requests party status in order to allow it to continue to argue and respond to substantive issues raised in this proceeding.

PRAYER

WHEREFORE, PREMISES CONSIDERED, Markout WSC requests that it be declared a party to this proceeding.

Respectfully submitted,

By: 

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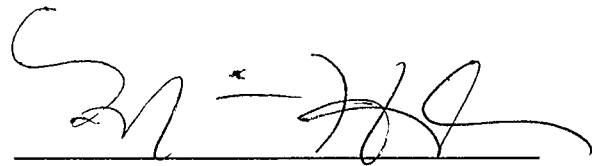
**ATTORNEYS FOR MARKOUT WATER
SUPPLY CORPORATION**

CERTIFICATE OF SERVICE

I certify that a copy of this document has been served on all parties of record on November 9, 2017 in accordance with 16 Tex. Admin. Code § 22.74.

Via Electronic mail – seidman@coatsrose.com
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