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PETITION OF THE CITIES OF
GARLAND, MESQUITE, PLANO,
AND RICHARDSON APPEALING
THE DECISION BY NORTH TEXAS
MUNICIPAL WATER DISTRICT
AFFECTING 2018 WHOLESALE
WATER RATES

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BEFORE THE

PUBLIC UTILITY COMMISSION
FILING CLERK

PUBLIC UTILITY COMMISSION

OF TEXAS

MOTION TO INTERVENE BY THE CITY OF ROYSE CITY

Comes now the City of Royse City ("Royse City") and pursuant to Public Utility Commission of Texas ("Commission") Rules at Title 16 Texas Administrative Code ("TAC") §§ 22.103 and 22.104, files this Motion to Intervene in this docket. In support thereof, Royse City would respectfully show as follows:

1. In this docket, the Cities of Garland, Mesquite, Plano and Richardson ("Petitioner Cities") have petitioned to appeal the Fiscal Year 2018 ("FY 2018") wholesale water rates established by the North Texas Municipal Water District ("NTMWD").

2. Pursuant to the Commission's Order No. 1 Setting Deadlines, the deadline to intervene in this proceeding is January 29, 2018. Accordingly, this Motion to Intervene is timely filed.

3. Royse City is a Texas home rule municipality located in Rockwall County and extending into portions of Collin and Hunt Counties. Royse City is also a retail public utility as defined under Texas Water Code § 13.002(19) providing retail water service to residents of its service area under Certificate of Convenience and Necessity ("CCN") No. 12827.¹

4. Royse City is one of several NTMWD "Member Cities" that has entered into the same wholesale water supply contract with NTMWD that is the subject of the wholesale rate

¹ Royse City has also been issued CCN No. 20813 authorizing it to provide retail sewer service within its designated service area.

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appeal filed by the Petitioner Cities in this docket, as well as in the existing PUC docket concerning the FY 2017 wholesale water rates in which Royse City is a named intervenor (Dk. No. 46662).

5. Royse City desires to ensure that the wholesale water rates it pays to NTMWD are in the public interest and are fair and reasonable.

6. The Commission's decision in this docket will affect the wholesale water rates charged by NTMWD to Royse City, and in turn affect the retail water rates that Royse City charges its water customer-residents.

7. Accordingly, Royse City has a justiciable interest which may be adversely affected by the outcome of the wholesale rate appeal filed by the Petitioner Cities and therefore is entitled to intervene pursuant to Commission rules.

8. Royse City's authorized representative in this docket is:

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WHEREFORE, Royse City respectfully requests that the Commission grant this Motion to Intervene and recognize it as a full party with all rights and obligations attendant thereto. Royse City further requests any such other relief to which it may be entitled.

Respectfully submitted,



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ATTORNEY FOR
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CERTIFICATE OF SERVICE

I hereby certify that a true and correct copy of this document was served on all parties of record via E-mail, regular mail, hand delivery or fax on January 26, 2018.



Stephen C. Dickman