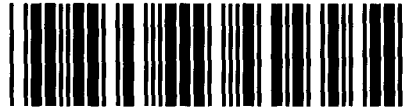


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DOCKET NO. 47920

BEEVILLE WATER SUPPLY
DISTRICT APPEAL OF RAW WATER
RATES ADOPTED BY CITY OF
CORPUS CHRISTI

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BEFORE THE PUBLIC UTILITY
COMMISSION OF TEXAS
PUBLIC UTILITY COMMISSION
FILING

PETITIONERS' RESPONSE TO DEFICIENCIES ALLEGED BY RESPONDENT

To the Honorable Public Utility Commission of Texas:

Beeville Water Supply District, joined by the City of Beeville as the real party in interest (the "Petitioners"), file this response to the deficiencies alleged by City of Corpus Christi, the Respondent.

I. TIMELINESS

As stated in the petition, Petitioners received a notice from the City of Corpus Christi, dated October 6, 2017, notifying them of an increase in raw water rates. Petitioners timely filed a petition appealing this rate increase, thus bringing Respondent's raw water rates within the scope of this proceeding. The December 1, 2017 letter referenced by Respondent and attached to its pleading at page 20 of Exhibit A does not nullify or change the rate increase which is the subject of the appeal.

II. BEEVILLE AS A PARTY

The petition was filed in the name of the Beeville Water Supply District, who Respondent agrees is a proper party. The petition was joined by the City of Beeville as the real party in interest, since the City of Beeville is the water districts only customer and ultimately pays all of the costs incurred by the water district. As such, the City of Beeville is a person affected by this proceeding and, if necessary, can be designated as an intervenor. If the Commission determines such intervenor status is required, City of Beeville so moves.

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III. JURISDICTION

The Commission has jurisdiction over the petition filed in the name of Beeville Water Supply District. Respondent argues only that the laws cited for the basis of jurisdiction do not apply to the City of Beeville, which ignores the fact that jurisdiction clearly exists for the petition because Beeville Water Supply District is a Petitioner.

IV. PRAYER

Wherefore, premises considered, Petitioners request the Commission to determine that this Petition meets the requirements of 16 TAC § 24.130 and grant such other and further relief to which Petitioners may be justly entitled.

Respectfully submitted.

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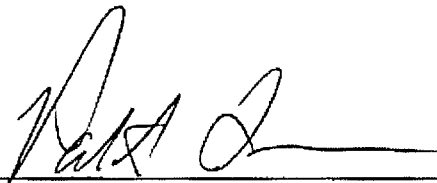
Attorneys for Petitioners
Beeville Water Supply District and City
of Beeville

CERTIFICATE OF SERVICE

I hereby certify that on this 2nd day of February, 2018, a true and correct copy of the above and foregoing was served by certified mail, return receipt requested, to the Respondent, the City of Corpus Christi, as follows:

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