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Docket No. 49154
SOAH Docket No. 473-19-5677 WS

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RATEPAYERS' APPEAL OF THE
DECISION BY LAGUNA MADRE
WATER DISTRICT TO CHANGE
RATES

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PUBLIC UTILITY COMMISSION

PUBLIC UTILITY COMMISSION
FILING CLERK
OF TEXAS

RATEPAYERS' LIST OF ISSUES FOR PRELIMINARY ORDER

COMES NOW, South Padre Island Golf Course via the undersigned SPI Golf Homeowners JV, Inc. ("Ratepayers"), and pursuant to the Order of Referral by the Public Utility Commission of Texas, offers the following list of issues to be included in the Commission's preliminary order, to be addressed in this docket:

1. Determining a reasonable interim rate for the furnishing of irrigation raw water (untreated water) Ratepayers are to be charged by LMWD during the pendency of this rate proceeding.
2. Whether LMWD's prices and terms for furnishing irrigation raw water (untreated water) to Ratepayer have been unjust, unreasonable and discriminatory.
3. All facts and legal authority the LMWD Board of Trustees considered when increasing the rate for the furnishing of irrigation raw water (untreated water) to Ratepayers.
4. Whether LMWD Board of Trustees considered refusing to sell irrigation raw water (untreated water) to Ratepayers, and if so, the factual and legal basis for such consideration.

5. Factors to be considered in determining a reasonable rate for LMWD for the furnishing of irrigation raw water (untreated water) to Ratepayers.
6. Once the rate for the furnishing of irrigation raw water (untreated water) by LMWD to Ratepayers is fixed by the Administrative Law Judge, what amount should be refunded from the date of Ratepayers' petition for rate review, plus interest at the statutory rate.

Respectfully submitted,

ROYSTON, RAYZOR, VICKERY & WILLIAMS, L.L.P.

By: /s/ Liliana Elizondo
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**ATTORNEYS FOR SOUTH PADRE
ISLAND GOLF COURSE AND SPI
GOLF HOMEOWNERS JV, INC.,
PETITIONER/RATEPAYERS**

Certificate of Service

I hereby certify, that a true and correct copy of the above and foregoing document was served via facsimile, certified mail/regular U.S. first class mail, and/or e-mail upon the following counsel of record on this the 1st day of July 2019.

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