



Control Number: 49871



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**PUC DOCKET NO. 49871**

**PETITION OF THE CITY OF RED OAK §  
INDUSTRIAL DEVELOPMENT §  
CORPORATION TO AMEND ROCKETT §  
SPECIAL UTILITY DISTRICT'S WATER §  
CERTIFICATE OF CONVENIENCE AND §  
NECESSITY IN DALLAS AND ELLIS §  
COUNTIES BY EXPEDITED RELEASE §**

**RECEIVED**  
**2019 SEP 13 AM 11:20**  
**PUBLIC UTILITY COMMISSION**  
**OF TEXAS**  
**FILED**

**ROCKETT SPECIAL UTILITY DISTRICT'S MOTION TO INTERVENE**

COMES NOW, ROCKETT SPECIAL UTILITY DISTRICT ("Rockett SUD") and files this Motion to Intervene pursuant to 16 Texas Administrative Code (TAC) §§ 22.101, et. seq. In support thereof, Rockett SUD respectfully would show as follows:

1. On August 19, 2019, City of Red Oak Industrial Development Corporation ("Petitioner") filed a petition for streamlined expedited release from Rockett SUD's Certificate of Convenience and Necessity (CCN) No. 10099, where the properties subject to the Petition is approximately 384 acres in Dallas and Ellis Counties (the "Property").

2. On August 23, 2019, the Commission's Administrative Law Judge issued Order No. 1, requiring Petitioner Information, Comments on Administrative Completeness and Notice, and Establishing Procedural Schedule, including Rockett SUD and other affected persons to file a motion to intervene or comment on the petition by September 23, 2019. Thus, Rockett SUD timely files this Motion to Intervene.

3. Rockett SUD has an interest in maintaining its CCN areas and protecting its investments in its infrastructure, and therefore Rockett SUD requests party status to allow it to continue to argue and respond to substantive issues raised in this proceeding. The staff and consulting engineer of Rockett SUD are currently investigating and verifying whether Rockett SUD has water facilities, including but not limited to 6" and 12" waterlines and water connection taps, within portions of the Property.

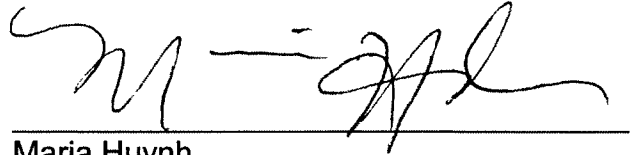
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## PRAYER

WHEREFORE, PREMISES CONSIDERED, Rockett SUD requests that it be declared a party to this proceeding.

Respectfully submitted,

JAMES W. WILSON & ASSOCIATES, PLLC



Maria Huynh  
State Bar No. 24086968  
James W. Wilson  
State Bar No. 00791944  
103 W. Main Street  
Allen, Texas 75013  
Tel: (972) 727-9904  
Fax: (972) 755-0904  
Email: mhuynh@jww-law.com

ATTORNEYS FOR ROCKETT SPECIAL  
UTILITY DISTRICT

## CERTIFICATE OF SERVICE

I certify that a true and correct copy of this document was served on the following parties of record on September 12, 2019, in accordance with 16 TAC § 22.74.

via e-mail: [eleanor.dambrosio@puc.texas.gov](mailto:eleanor.dambrosio@puc.texas.gov)

Eleanor D'Ambrosio  
Attorney-Legal Division  
Public Utility Commission  
1701 N. Congress  
P.O. Box 13326  
Austin, Texas 78711-3326  
**Attorney for the Commission**

via e-mail: [gcrump@qlawfirm.com](mailto:gcrump@qlawfirm.com)

Georgia N. Crump  
Lloyd Gosselink  
Rochelle & Townsend, P.C.  
816 Congress Avenue  
Suite 1900  
Austin, Texas 78701  
**Attorney for Petitioner**



Maria Huynh

