



Control Number: 49926



Item Number: 15

Addendum StartPage: 0

APPLICATION OF CRYSTAL CLEAR  
SPECIAL UTILITY DISTRICT FOR A  
NAME CHANGE AND TO AMEND ITS  
SEWER CERTIFICATE OF  
CONVENIENCE AND NECESSITY IN  
COMAL, HAYS, AND GUADALUPE  
COUNTIES

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PUBLIC UTILITY COMMISSION  
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PUBLIC UTILITY COMMISSION  
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**CARSON SELECT INVESTMENTS, LP'S MOTION TO INTERVENE AND NOTICE  
OF APPEARANCE**

TO THE HONORABLE ADMINISTRATIVE LAW JUDGE:

NOW COMES, CARSON SELECT INVESTMENTS, LP, pursuant to Public Utility Commission ("PUC") Procedural Rules §§ 22.101, 22.102, 22.103 and 22.104, and file this Motion to Intervene and Notice of Appearance in the above referenced proceeding, and in support thereof, respectfully shows the following:

**I. AUTHORIZED REPRESENTATIVE**

Attorneys Patrick L. Reznik and Carly Barton pursuant to P.U.C. PROC. R. 22.101(a), hereby notice their appearance as counsel on behalf of Carson Select Investments, LP in the above-styled and numbered proceeding before the Public Utility Commission of Texas.

The name, address, and telephone number of Intervenor's authorized representatives and lead counsel is as follows:

Patrick L. Reznik  
**BRAUN & GRESHAM, PLLC**  
P.O. Box 1148  
Dripping Springs, Texas 78620  
512-894-5426 (telephone)  
512-894-3405 (fax)  
Email: [preznik@braungresham.com](mailto:preznik@braungresham.com)

Carson Select Investments, LP requests that the Commission and all parties to this proceeding serve copies of all notices, correspondence, pleadings, briefs, requests for information, and other documents on said authorized representatives.

## **II. JURISDICTION**

The Commission has jurisdiction over the parties and subject matter of this proceeding pursuant to Chapter 24 of the PUC Procedural Rules.

## **III. BASIS FOR INTERVENTION**

Carson Select Investments, LP has a justiciable interest which may be adversely affected by the outcome of this proceeding have standing to intervene under P.U.C. PROC. R. 22.103(b)(2). Carson Select Investments, LP owns property that may be directly or indirectly impacted by the Crystal Clear Special Utility District's proposed onsite wastewater treatment plant to be situated in the area of the proposed CCN. Pursuant to the Public Notice published in The Daily Record of San Marcos, Texas on January 15, 2020, this Motion to Intervene is filed timely. Carson Select Investments, LP requests that this Motion to Intervene be granted and that it be recognized as a party.

## **IV. ACKNOWLEDGEMENTS**

Carson Select Investments, LP acknowledges: (1) they will be a party to the case; (2) they will be required to respond to all discovery requests from other parties in the case; (3) if they file testimony, other parties may cross-examine them at the hearing; (4) if they file any documents in this case, copies of those documents will be served to every other party in this case, except where modified by alternative service procedures set out by order in this proceeding; and (5) they are bound by the Procedural Rules of the Public Utility Commission of Texas and the State Office of Administrative Hearings.

WHEREFORE, PREMISES CONSIDERED, Carson Select Investments, LP respectfully requests that this Motion to Intervene be granted, that they be allowed to participate in this proceeding as a party with all rights thereof to the full extent that they desire to do so, and for such further relief to which they may be entitled.

Respectfully submitted,

BRAUN & GRESHAM, PLLC

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/s/Patrick L. Reznik

Patrick L. Reznik  
State Bar No. 16806780  
Carly Barton  
State Bar No. 24086063

**ATTORNEYS FOR CARSON SELECT  
INVESTMENTS, LP**

**CERTIFICATE OF SERVICE**

I certify that a copy of this document will be served on all parties of record on February 5, 2020 in accordance with Public Utility Commission Procedural Rule 22.74.

/s/Patrick L. Reznik

Patrick L. Reznik