



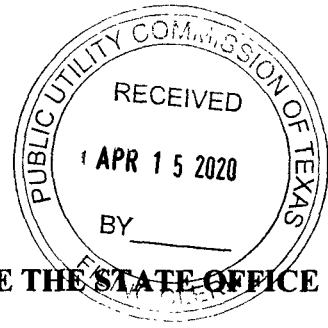
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SOAH DOCKET NO. 473-20-3110.WS
PUC DOCKET NO. 50200



APPLICATION OF UNDINE TEXAS, LLC § BEFORE THE STATE OFFICE
AND UNDINE TEXAS ENVIRONMENTAL, §
LLC FOR AUTHORITY TO CHANGE § OF
RATES §
§ ADMINISTRATIVE HEARINGS

COUNTRY VISTA HOMEOWNERS COMMITTEE'S LIST OF ISSUES

COMES NOW the Country Vista Homeowners Committee (CVHC), representing the residents and homeowners of the Country Vista residential subdivision located in Johnson County, Texas, and files this List of Issues and would show the following:

I. BACKGROUND

On January 18, 2019, Undine Texas, LLC (UT) and Undine Texas Environmental, LLC (UTE)(collectively, Undine) filed an application for authority to change rates pursuant to Texas Water Code (TWC) § 13.1871 and 16 Texas Administrative Code (TAC) §§ 24.25 - 24.44. More than 10% of the ratepayers affected by Undine's proposed increase filed protests, and the Office of Policy and Docket Management issued an Order of Referral on March 19, 2020, referring this docket to State Office of Administrative Hearings (SOAH). The Order also stated that any interested party may file a list of issues to be addressed by March 26, 2020. Therefore, this pleading is timely filed.

II. LIST OF ISSUES TO BE ADDRESSED

CVHC recommends that the Commission identify issues to be addressed based on the Preliminary Order adopted in Docket No. 49887¹ with modifications as appropriate to reflect the specific facts in this docket, including the following additions:

1. Does UTE meet the criteria for a consolidated rate under TWC § 13.145?
 - a. Are the systems included in UTE's proposed consolidated tariff substantially similar in terms of facilities, condition, quality of service, and cost of service?

¹ Application of Kendall West Utility, LLC for Authority to Change Rates, Docket No. 49887, Preliminary Order (Dec. 16, 2019).

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- b. Does the proposed consolidated tariff include rates that promote water conservation for single-family residences?
2. Are any of UTE's facilities of a condition and quality to warrant being excluded from this application.
3. What acquisition adjustments, if any, for plant, property, and equipment acquired by UTE are appropriate under 16 TAC § 24.41(d) and (e)?
4. Do the post-test year adjustments to UTE's rate base meet the criteria under 16 TAC § 24.41(c)(5)?
5. Are the utility's proposed revisions to its tariffs and rate schedules appropriate? Is it appropriate to adopt a phased-in rate due to the size of the rate increase requested by UTE?

III. CONCLUSION

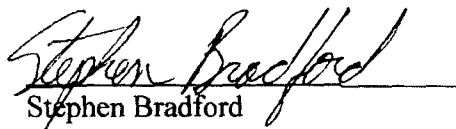
CVHC respectfully requests the issuance of a Preliminary Order consistent with the above recommendations.

Dated: March 26, 2020

Respectfully submitted,

**COUNTRY VISTA
HOMEOWNERS COMMITTEE**

Stephen Bradford
Authorized Representative

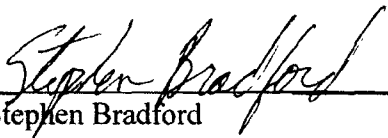


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CERTIFICATE OF SERVICE

I certify that, unless otherwise ordered by the presiding officer, notice of the filing of this document was provided to all parties of record via electronic mail on March 26, 2020, in accordance with the Order Suspending Rules, issued in Project No. 50664.



Stephen Bradford