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PUC DOCKET NO. 50721

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APPLICATION OF CRYSTAL CLEAR WATER, INC. FOR AUTHORITY TO CHANGE RATES

PUBLIC UTILITY COMMISSION

OF TEXAS

OFFICE OF PUBLIC UTILITY COUNSEL'S UNOPPOSED MOTION TO INTERVENE

Pursuant to Texas Water Code § 13.017(b), and 16 Texas Administrative Code § 22.103(b), the Office of Public Utility Counsel ("OPUC") moves to intervene in this proceeding as a matter of right on behalf of the residential and small commercial consumers in Crystal Clear Water Inc.'s ("CCWI") service territory. OPUC's Interim Chief Executive and Public Counsel has determined that residential and small commercial consumers in CCWI's service territory are in need of representation in this proceeding. Therefore, OPUC has standing to participate in this proceeding that is expressly conferred by statute.

On November 12, 2021, the Commission Counsel for the Public Utility Commission of Texas ("Commission") issued a memo noting that CCWI failed to give OPUC proper notice of its application filed on April 8, 2020. For the first time after the Commission Counsel's memo, CCWI reached out to OPUC and emailed OPUC CCWI's application filed on April 8, 2020, and any supplements and amendments to its application, responses to Commission Staff's requests for information, and settlement documents on November 23, 2021. OPUC subsequently engaged through counsel for CCWI in limited settlement negotiations in this case. CCWI, Commission Staff, OPUC (on limited issues as reflected in the settlement agreement) and the other parties have now reached an agreement and will be filing the settlement documents and motion to admit evidence with the Commission. CCWI, Commission Staff, Sam Wells (representative for the intervenors of the Airport water system), Pat Cauley (representative of the intervenors of the Whispering Ridge water system) are unopposed to OPUC's Motion to Intervene.

Dated: February 28, 2022

Respectfully submitted,

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ATTORNEYS FOR THE OFFICE OF PUBLIC UTILITY COUNSEL

CERTIFICATE OF SERVICE

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I hereby certify that a copy of the foregoing document was served on all parties of record in this proceeding on this 28th day of February 2022 by facsimile, electronic mail, and/or first class, U.S. Mail.

Renee L. Wiersema