

Control Number: 50895



Item Number: 5

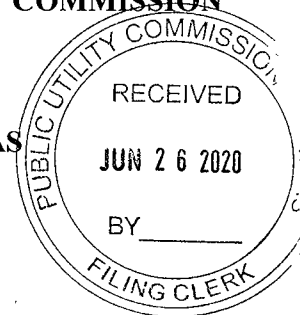
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PUC DOCKET NO. 50895

APPLICATION OF CHAMPS WATER §
COMPANY AND MIDWAY WATER §
UTILITIES, INC. FOR SALE, §
TRANSFER, OR MERGER OF §
FACILITIES AND CERTIFICATE §
RIGHTS IN HARRIS AND §
MONTGOMERY COUNTIES §

PUBLIC UTILITY COMMISSION

OF
TEXAS



CITY OF HOUSTON'S MOTION TO INTERVENE

Pursuant to Public Utility Commission ("PUC" or "Commission") Procedural Rules 22.103 and 22.104, the City of Houston files this Motion to Intervene as a party in the above-captioned proceeding and in support thereof would respectfully show as follows:

I. AUTHORIZED REPRESENTATIVE

1. The names, address and telephone numbers of the person(s) designated to represent the City of Houston are:

YuShan Chang
Sr. Assistant City Attorney
City of Houston Legal Department
900 Bagby, 4th Floor
Houston, TX 77002
832.393.6442
832.393.6259 (Facsimile)
YuShan.Chang@houstontx.gov

Alisa Talley
Division Manager
Administration & Regulatory Affairs Department
City of Houston
611 Walker, 13th Floor
Houston, Texas 77002
832.393.8531
832.393.8527 (Facsimile)
Alisa.Talley@houstontx.gov

2. The City of Houston hereby requests that the Commission and all parties to this proceeding serve copies of all filings and submissions, whether notices, correspondence, pleadings, briefs or other documents upon the City of Houston's designated representatives.

II. STANDING TO INTERVENE

3. The City of Houston has standing to intervene under P.U.C. Proc. Rules 22.103 and 22.104 as a party with justiciable interest which may be adversely affected by the outcome of this docket.

4. The City of Houston has original jurisdiction over the rates, operations, and services of a water and sewer utility in areas in the municipality pursuant to § 13.042 of the Texas Water Code.

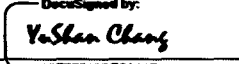
5. The City of Houston has a justiciable interest in the outcome of the request for approval of Champs Water Company and Midway Water Utilities Inc.'s sale, transfer, or merger of facilities because part of the facilities is in the City of Houston and the request may affect the rates, operations, and services for water and sewer utility customers within the City of Houston.

III. REQUEST TO INTERVENE

WHEREFORE PREMISES CONSIDERED, the City of Houston respectfully requests the Commission grant the City of Houston's Motion to Intervene.

Respectfully submitted,

CITY OF HOUSTON, TEXAS
RONALD C. LEWIS, CITY ATTORNEY

By: 
YuShan Chang
Senior Assistant City Attorney
State Bar No. 24040670
P.O. Box 368, Houston, Texas 77001-0368
City Hall Annex, 900 Bagby, 4th Floor
Houston, Texas 77002
(832) 393-6442 (phone)
(832) 393-6259 (fax)

yushan.chang@houstontx.gov

ATTORNEYS FOR THE CITY OF
HOUSTON, TEXAS

CERTIFICATE OF SERVICE

I, YuShan Chang, Senior Assistant City Attorney for City of Houston hereby certify that on this 26th day of June 2020, a true and correct copy of the foregoing document was served upon all parties of record by email pursuant to Order Suspending Rules in PUC Docket No. 50664.

DocuSigned by:
YuShan Chang
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YuShan Chang