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**PUC DOCKET NO. 51355**

**PETITION OF LDG001, LLC TO § PUBLIC UTILITY COMMISSION  
AMEND MOUNTAIN PEAK SPECIAL §  
UTILITY DISTRICT'S CERTIFICATE § OF TEXAS  
OF CONVENIENCE AND NECESSITY §  
IN JOHNSON COUNTY BY §  
EXPEDITED RELEASE §**

**MOUNTAIN PEAK SPECIAL UTILITY DISTRICT'S  
MOTION TO INTERVENE**

Mountain Peak Special Utility District ("Mountain Peak SUD") files this Motion to Intervene as a party to the above-captioned proceeding. In support of its Motion, Mountain Peak SUD shows as follows:

1. LDG001, LLC filed a petition to amend Mountain Peak SUD's Water Certificate of Convenience and Necessity ("CCN") No. 10908 in Johnson County by expedited release on September 22, 2020. Mountain Peak SUD is the current CCN holder for the subject tracts. Thus, Mountain Peak SUD has a justiciable interest that may be adversely affected by the outcome of this proceeding, specifically the loss of its certificated service rights and the potential for stranded capacity in its existing utility infrastructure.

2. Pursuant to 16 Tex. Admin. Code § 22.104(b), this motion is timely filed.

3. Mountain Peak SUD's authorized representative in this matter is:

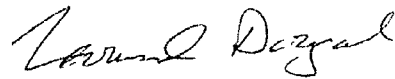
Leonard H. Dougal  
Jackson Walker LLP  
100 Congress Avenue, Suite 1100  
Austin, Texas 78701  
Telephone: (512) 236-2233  
Facsimile: (512) 391-2112  
E-mail: ldougal@jw.com

4. Mountain Peak SUD respectfully requests that all correspondence, pleadings, briefs, requests for information, responses to requests for information, and other documents in this

proceeding be served upon their legal counsel. Mountain Peak SUD respectfully requests that it be granted party status in this proceeding and all such other and further relief as it may be justly entitled.

Respectfully submitted,

JACKSON WALKER L.L.P.



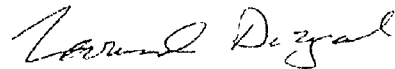
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Leonard H. Dougal  
State Bar No. 06031400  
100 Congress Avenue, Suite 1100  
Austin, Texas 78701  
Telephone: (512) 236-2233  
Facsimile: (512) 391-2112  
Email: [ldougal@jw.com](mailto:ldougal@jw.com)

**ATTORNEY FOR MOUNTAIN PEAK  
SPECIAL UTILITY DISTRICT**

**CERTIFICATE OF SERVICE**

I certify that notice of the filing of this document was provided to all parties of record via electronic mail on September 29, 2020, in accordance with the Order Suspending Rules, issued in Project No. 50664.



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Leonard Dougal