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DOCKET NO. 51400

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PETITION OF RCR HEMPSTEAD
RAIL, LP TO AMEND G&W WATER
CERTIFICATE OF CONVENIENCE
AND NECESSITY
IN WALLER COUNTY BY EXPEDITED
RELEASE

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BEFORE THE
PUBLIC UTILITY COMMISSION
OF TEXAS

G & W WATER SUPPLY CORPORATION'S
MOTION TO INTERVENE AND
NOTICE OF APPEARANCE

COMES NOW, G & W Water Supply Corporation ("G & W") and files this Motion to Intervene and Notice of Appearance pursuant to 16 Texas Administrative Code sections 22.101, 22.103(b), and 22.104(b). In support here of, G & W respectfully shows the following:

I. MOTION TO INTERVENE

On October 7, 2020, RCR Hempstead Rail, LP, filed with the Public Utility Commission ("PUC") a petition for a streamlined expedited release of a portion of G & W's Water CCN 12391 service area.

G & W has standing to intervene under 16 Texas Administrative Code section 22.103(b). G & W has justiciable interests that will be adversely affected by the outcome of this proceeding. Specifically, G & W will lose approximately 137.04 acres of its service area upon which it has relied in planning, design, construction, and debt.

G & W has a right to participate that is conferred by Commission rule. Order No. 1 in this docket and Commission rules concerning streamlined expedited release provide that the current CCN holder may file a response to the petition. *See* 16 TAC § 24.245(h)(6).

This Motion to Intervene is timely, as it is filed less than forty-five days after the Petition in this matter was filed. *See* 16 TAC § 22.104(b).

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II. NOTICE OF APPEARANCE

The undersigned attorney, Mary K. Sahs of Mary K. Sahs, P.C., hereby files this Notice of Appearance on behalf of G & W, pursuant to 16 Texas Administrative Code section 22.101. Please direct all future communications to the undersigned.

III. PRAYER

WHEREFORE, PREMISES CONSIDERED, G & W respectfully requests: (i) that it be declared a party to this proceeding; and (ii) that all parties direct further pleadings and correspondence regarding this matter to the undersigned.

Respectfully submitted,
Mary K. Sahs

MARY K. SAHS, P.C.

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**ATTORNEY FOR G & W WATER
SUPPLY CORPORATION**

CERTIFICATE OF SERVICE

The undersigned hereby certifies that a copy of foregoing G & W Water Supply Corporation's Motion to Intervene and Notice of Appearance was served on all parties of record in this proceeding on November 2, 2020 by electronic mail.

Mary K. Sahs

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