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DOCKET NO. 51400

**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).

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

Mary K. Sahs