



Control Number: 51531



Item Number: 4

Addendum StartPage: 0

RECEIVED

DOCKET NO. 51531

2020 DEC 11 PM 1:33

PETITION OF JLM 717 KAUFMAN LP	§	PUBLIC UTILITY COMMISSION
TO AMEND THE CITY OF	§	FILING CLERK
CRANDALL'S CERTIFICATE OF	§	OF TEXAS
CONVENIENCE AND NECESSITY IN	§	
KAUFMAN COUNTY BY EXPEDITED	§	
RELEASE		

**CITY OF CRANDALL'S MOTION TO INTERVENE**

The City of Crandall (City" files this Motion to Intervene as a party to the above-captioned proceeding. In support of its Motion, the City shows as follows:

1. JLM 171 Kaufman LP filed a petition to amend the City's Water Certificate of Convenience and Necessity (CCN) No. 11295 in Kaufman County, Texas by expedited release on November 17, 2020. JLM 171 Kaufman LP owns property within the City's CCN and seeks to remove that property from the City's CCN. Thus, the City has a justiciable interested that may be affected by the outcome of the proceeding.

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

3. The City's authorized representative in this matter is as follows:

Emily W. Rogers  
Bickerstaff Heath Delgado Acosta LLP  
3711 S. MoPac Expressway, Bld. 1, Suite 300  
Austin, TX 78746  
Telephone: 512-472-8021  
Facsimile: 512-320-5638  
[erogers@bickerstaff.com](mailto:erogers@bickerstaff.com)

4. Service of all pleadings and other documents should be made upon the City's authorized representative. The City respectfully requests that it be granted party status in this proceeding and all other and further relief as it may be justly entitled.

Respectfully submitted,

Emily W. Rogers  
State Bar No. 24002863  
[erogers@bickerstaff.com](mailto:erogers@bickerstaff.com)

Bickerstaff Heath Delgado Acosta LLP  
3711 S. MoPac Expressway  
Building One, Suite 300  
Austin, TX 78746  
Telephone: (512) 472-8021  
Facsimile: (512) 320-5638

BY: *Emily W. Rogers*  
Emily W. Rogers

**ATTORNEY FOR THE  
CITY OF CRANDALL**

**CERTIFICATE OF SERVICE**

I certify that a copy of this document was served on the parties in the matter via email on December 11, 2020, in accordance with the requirements of 16 Tex. Admin. Code § 22.74, Order No. 1, and PUC Order No. 2 in Docket No. 50664.

*Emily W. Rogers*  
Emily W. Rogers