



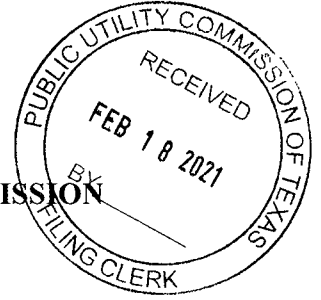
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DOCKET NO. 51698



PETITION OF TRENDMAKER § PUBLIC UTILITY COMMISSION
HOMES, INC. TO AMEND MSEC §
ENTERPRISES INC.'S CERTIFICATE § OF TEXAS
OF CONVENIENCE AND NECESSITY §
IN MONTGOMERY COUNTY BY §
EXPEDITED RELEASE §

MSEC ENTERPRISES, INC.'S MOTION TO INTERVENE

MSEC Enterprises, Inc.'s (MSEC) files this Motion to Intervene in the above-styled proceeding. In support thereof, MSEC shows the following:

1. On January 8, 2021, Trendmaker Homes, Inc. (Trendmaker) filed a petition to amend MSEC's water certificate of convenience and necessity (CCN) No. 12887 in Montgomery County. Trendmaker owns property within MSEC's CCN and seeks to remove that property from MSEC's CCN. Thus, MSEC has a justiciable interest in this proceeding.
2. Pursuant to 16 Tex. Admin. Code § 22.104(b), this motion is timely filed.
3. MSEC's authorized representative in this matter is:

Jamie L. Mauldin
Lloyd Gosselink Rochelle & Townsend, P.C.
816 Congress Avenue, Suite 1900
Austin, Texas 78701
512-322-5800 Telephone
512-472-0532 Facsimile
jmauldin@lglawfirm.com

4. MSEC requests that all correspondence, pleadings, briefs, requests for information, responses to requests for information, and all other documents in this proceeding be served upon its authorized representative.

WHEREFORE PREMISES CONSIDERED, MSEC respectfully requests that this Motion to Intervene be granted and any other relief to which it may be entitled.

Respectfully submitted,

**LLOYD GOSSELINK ROCHELLE
& TOWNSEND, P.C.**

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Austin, Texas 78701
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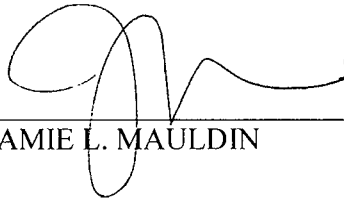


JAMIE L. MAULDIN
State Bar No. 24065694

ATTORNEY FOR MSEC ENTERPRISES, INC.

CERTIFICATE OF SERVICE

I hereby certify that notice of the filing of this document was provided to all parties of record via electronic mail on February 18, 2021, in accordance with the Order Suspending Rules, issued in Project No. 50664.



JAMIE L. MAULDIN