



Control Number: 51870



Item Number: 99

Addendum StartPage: 0

DOCKET NO. 51870

APPLICATION OF FOREST GLEN §  
UTILITY COMPANY TO AMEND ITS §  
SEWER CERTIFICATE OF §  
CONVENIENCE AND NECESSITY IN §  
MEDINA COUNTY §

RECEIVED  
2021 MAY 17 PM 1:01  
BEFORE THE  
PUBLIC UTILITY COMMISSION  
OF TEXAS

**FOREST GLEN UTILITY COMPANY'S SUPPLEMENTAL RESPONSE TO MOTIONS  
TO INTERVENE**

COMES NOW, Forest Glen Utility Company ("Applicant" or "Forest Glen") and submits this Supplemental Response to the Motions to Intervene ("Supplemental Response") in the above-docketed proceeding. In support thereof, Forest Glen would show the following:

**I. BACKGROUND**

1. On March 4, 2021, Forest Glen filed an Application to amend sewer certificate of convenience and necessity ("CCN") No. 21070 in Medina County.
2. On March 5, 2021, the Administrative Law Judge ("ALJ") of the Public Utility Commission of Texas ("Commission") issued Order No. 1 requiring Commission Staff to file its recommendation on administrative completeness which it did on April 5, 2021.
3. Order No. 2 issued April 6, 2021, found the application to be administratively complete and directed Applicant to provide notice in accordance with Commission Staff's recommendation.
4. Applicant published notice on April 22 and 29, 2021 and mailed notice on April 15, 2021.
5. Forest Glen's Affidavit of Notice was filed on May 6, 2021.

6. On May 10, 2021, Forest Glen timely filed a Response to Motions to Intervene that had been filed by 81 individuals with the Commission from May 3 through May 10, 2021.<sup>1</sup>
7. Since May 10 through May 14, 2021, five additional individuals have filed Motions to Intervene which are the subject of this Supplemental Response.<sup>2</sup>
8. Therefore this Supplemental Response is timely filed.

## **II. LEGAL AUTHORITY**

Title 16 Texas Administrative Code (“TAC”) § 24.235 establishes the notice requirements for new and amended CCNs.

(b) After reviewing and, if necessary, modifying the proposed notice, the commission will provide the notice to the applicant for publication and/or mailing.

(1) For applications for a new CCN or a CCN amendment, the applicant shall mail the notice to the

following:

(A) cities, districts, and neighboring retail public utilities providing the same utility service

whose corporate boundaries or certificated service area are located within two miles from

the outer boundary of the requested area.

(B) the county judge of each county that is wholly or partially included in the requested area; and

(C) each groundwater conservation district that is wholly or partially included in the requested area.

(2) Except as otherwise provided by this subsection, in addition to the notice required by subsection (a) of this section, the applicant shall mail notice to each owner of a tract of land that is at least 25 acres and is wholly or partially included in the requested area. Notice required under this subsection must be mailed by first class mail to the owner of the tract of land according to the most current tax appraisal rolls of the applicable central appraisal district at the time the commission received the application for the CCN. Good faith efforts to comply with the requirements of this subsection shall be

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<sup>1</sup> Forest Glen incorporates its May 10, 2021 Response to Motions to Intervene herein for all purposes as if set out in full.

<sup>2</sup> See Attachment A, Intervenor Map and List showing location within Potranco Ranch Subdivision.

considered adequate mailed notice to landowners. Notice under this subsection is not required for a matter filed with the commission under:

(A) TWC §13.248 or §13.255; or

(B) TWC Chapter 65.

(3) Utilities that are required to possess a CCN but that are currently providing service without a CCN must provide individual mailed notice to all current customers. The notice must contain the current rates, the effective date of the current rates, and any other information required in the application or notice form or by the commission.<sup>3</sup>

The criteria for granting and amending CCNs states:

(e) In considering whether to grant or amend a CCN, the commission will also consider:

(1) the adequacy of service currently provided to the requested area;

(2) the need for additional service in the requested area, including, but not limited to:

(A) **whether any landowners, prospective landowners, tenants, or residents have requested service;**

(B) economic needs;

(C) environmental needs;

(D) written application or requests for service; or

(E) reports or market studies demonstrating existing or anticipated growth in the area;

(3) the effect of granting or amending a CCN on the CCN recipient, **on any landowner in the requested area**, and on any retail public utility that provides the same service and that is already serving any area within two miles of the boundary of the requested area. These effects include but are not limited to regionalization, compliance, and economic effects;

(4) the ability of the applicant to provide adequate service, including meeting the standards of the TCEQ and the commission, taking into consideration the current and projected density and land use of the requested area;

(5) the feasibility of obtaining service from an adjacent retail public utility;

(6) the financial ability of the applicant to pay for the facilities necessary to provide continuous and

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<sup>3</sup> 16 TAC § 24.235(b).

adequate service and the financial stability of the applicant, including, if applicable, the adequacy of the applicant's debt-equity ratio;

(7) environmental integrity;

(8) the probable improvement in service or lowering of cost to consumers in that area resulting from the granting of the new CCN or a CCN amendment; and

(9) the effect on the land to be included in the requested area.<sup>4</sup>

Section 24.3(2) defines an affected person to be, “[a]ny landowner **within an area for which a certificate of public convenience and necessity is filed**, any retail public utility affected by any action of the regulatory authority, any person or corporation whose utility service or rates are affected by any proceeding before the regulatory authority, or any person or corporation that is a competitor of a retail public utility with respect to any service performed by the retail public utility or that desires to enter into competition.”<sup>5</sup>

And, 16 TAC § 22.103(b) further sets out the standard for intervention:

(b) Standing to intervene. Persons desiring to intervene must file a motion to intervene and be recognized as a party under §22.104 of this title (relating to Motions to Intervene) in order to participate as a party in a proceeding. Any association or organized group must include in its motion to intervene a list of the members of the association or group that are persons other than individuals that will be represented by the association or organized group in the proceedings. The group or association shall supplement the list of members represented in the motion at any time a member is added or deleted from the list of members represented. A person has standing to intervene if that person:

- (1) has a right to participate which is expressly conferred by statute, commission rule or order or other law; or
- (2) has or represents persons with a justiciable interest which may be adversely affected by the outcome of the proceeding.<sup>6</sup>

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<sup>4</sup> 16 TAC § 24.227(e)(emphasis added).

<sup>5</sup> 16 TAC § 24.3(2)(emphasis added).

<sup>6</sup> 16 TAC § 22.103(b).

### III. ARGUMENT

Forest Glen was granted its original sewer CCN in 2012 covering approximately 320 acres in the then-newly developed Potranco Ranch Subdivision. Forest Glen's CCN was amended in 2018 to serve an additional 84.62 acres as the residential subdivision grew in rural Medina County. The pending application for amendment now seeks authority to include an additional undeveloped 185 acres in an area to be developed sometime in the future and known as Potranco Oaks and Potranco Gardens adjacent to the existing Potranco Ranch Subdivision. As Attachment 9 to the Application clearly shows, the undeveloped property to be included in the new CCN area is currently owned by only one landowner, HK Development and not by any of the individuals who have attempted to intervene (or complained) in this case.<sup>7</sup> Forest Glen provides continuous and adequate wastewater and reclaimed water service to 447 existing customers.

Since Forest Glen's initial Response to Motions to Intervene of May 10, 2021, five additional individuals have requested to intervene in this docket. As depicted by the hollow orange circles on the Attachment A-1 map, each of these additional intervenors currently resides within the existing CCN area and not in the 185 acres owned by HK Development that Forest Glen is requesting to add to its CCN area.<sup>8</sup> Attachment 11 to the Application, the Preliminary Engineering Report's Master Development Plan, shows that both the initial 81 and the additional five individuals requesting intervention after May 10, 2021, reside outside the proposed area to be added to the existing CCN.<sup>9</sup> Since **none** of the intervenors live in the new CCN area, none are affected persons who have standing to participate in this amendment proceeding.

Section 24.3(2) clearly states that an affected person is any landowner *within* an area for which a certificate of public convenience and necessity is filed.<sup>10</sup> However, the existing customers who are Intervenor in this case live *outside* of the proposed CCN area and within the original

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<sup>7</sup> See Attachment B, Attachment 9 to the Application to Amend Sewer CCN, Non-standard Service Application, FGU000013-000015.

<sup>8</sup> As noted above, Ms. Wurzbach is not a Forest Glen customer and does not reside within Potranco Ranch Subdivision.

<sup>9</sup> See Attachment C, Attachment 11 to the Application to Amend Sewer CCN, Preliminary Engineering Report, Master Development Plan, FGU000025.

<sup>10</sup> 16 TAC § 24.3(2)(emphasis added).

CCN area, Potranco Ranch Subdivision. Furthermore and logic aside, even if the Intervenor did live within the new undeveloped area that is not yet built out, each initial and additional intervenor has failed to demonstrate that the CCN amendment would affect him or her in a manner that is not common to members of the general public.<sup>11</sup> Any justiciable interest these proposed Intervenor may claim must stem from a legal right, duty, privilege, power, or economic interest affected by the outcome of this hearing that relates to the new area to be added to the CCN.<sup>12</sup> Furthermore, to have standing, each Intervenor must demonstrate he or she will be adversely affected by the outcome of this proceeding.<sup>13</sup> The problem for these proposed Intervenor, however, is that they will not be affected by the new undeveloped 185 acres since they do not live or own property there. Moreover, some of the claims appear to be operation complaints about the Wastewater Treatment Plant (“WWTP”), which are not germane to this proceeding and not within the jurisdiction of the Commission. Legislation grants the TCEQ with exclusive authority over WWTP operations and the associated discharge permits.

Although the Commission Staff recommended that Applicant provide notice to “all landowners,” Commission rules do not require such notice.<sup>14</sup> Section 24.235 does not require notice to all landowners, let alone current customers. . . just owners of tracts of land that are at least 25 acres and wholly or partially included in the requested area.<sup>15</sup> Under Commission rules and authorizing statutory authority, current customers would be afforded notice under the rule only if the utility was already providing service without the required CCN, which is not the case here. Thus, while Commission staff forced Forest Glen to provide mailed notice to its existing customers, this notice was over and beyond what it was required to do. Providing courtesy notice

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<sup>11</sup> Prior to September 1, 2014, when the Legislature transferred subject matter jurisdiction over CCNs from the Texas Commission on Environmental Quality (“TCEQ”) to the Commission (*see* Act of May 25, 2013, 83<sup>rd</sup> Leg., R.S., ch 171 (S.B. 567), § 13, eff. Sept. 1, 2013), the Motions to Intervene would have been analyzed under Texas Water Code (“TWC”) § 5.115 and the TCEQ affected persons rules promulgated thereunder, 30 TAC 55.3 *et seq.*

<sup>12</sup> TWC § 5.115(a). Note that the Commission’s § 22.103(b)(2) justiciable interest (and “old” TCEQ affected person) intervention standard is slightly different than the definition of “affected person” at 16 TAC § 24.3(2) and TWC § 13.002(1).

<sup>13</sup> 16 TAC§22.103(b)(2).

<sup>14</sup> *See* Commission Staff’s Recommendation on Administrative Completeness of the Application, Proposed Notice, and Proposed Procedural Schedule at 1; Note, while the pleading recommends notice to “all landowners,” Staff’s memo only recommends notice to “any affected customers, and other affected parties *in the requested area.*” (emphasis added).

<sup>15</sup> 16 TAC§ 24.235(b)(2).

to current Forest Glen customers in no way confers standing on these proposed Intervenor who otherwise lack any regulatory or statutory authority to intervene.

As the Commissioners stated during their May 6, 2021 Open Meeting, “rules are rules.” Rules are in place for a reason. Under Commission rules and under provisions of the Texas Water Code, these additional proposed Intervenor lack standing and a justiciable interest to intervene in this CCN amendment because these existing customers are not affected persons under the law.

#### **IV. CONCLUSION**

WHEREFORE, PREMISES CONSIDERED, Forest Glen Utility Company respectfully prays that the Commission ALJ deny all Motions to Intervene and other complaints, including the additional five requests received from May 10 through May 14, 2021.

Respectfully submitted,

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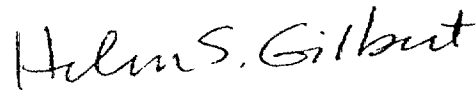
Helen S. Gilbert

**ATTORNEYS FOR FOREST GLEN  
UTILITY COMPANY**



**CERTIFICATE OF SERVICE**

I hereby certify that I have or will serve a true and correct copy of the foregoing document via hand delivery, facsimile, electronic mail, overnight mail, U.S. mail, or Certified Mail Return Receipt Requested on all parties on the 17<sup>th</sup> of May 2021.



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Helen S. Gilbert

# DOCKET NO. 51870 - ATTACHMENT A-1

FGU Customers Requesting Intervention

As of: 5/17/2021

Duplicate

Did not req intervention

| Ref # | Request to Intervene     | Complaint Description     | Name  | Service Address Street | Service Address City | State | Mail Zip code | Reference on ATT.11 Master Dev Plan Lot # |
|-------|--------------------------|---------------------------|---|------------------------|----------------------|-------|---------------|---|
| 1     | <a href="#">5/5/2021</a> | Intervention Request      | <a href="#">MICHAEL/JENNIFER MILLS</a>                  | 192 MISTY DAWN         | CASTROVILLE          | TX    | 78009         |   |
| 2     | <a href="#">5/6/2021</a> | Intervention Request      | CECIL/VANESSA PERKINS                                   | 196 MISTY DAWN         | CASTROVILLE          | TX    | 78009         |   |
| 3     | <a href="#">5/5/2021</a> | Intervention Request      | ALBERTO/YVONNE NIETO                                    | 397 BARDEN PARKWAY     | CASTROVILLE          | TX    | 78009         |   |
| 4     | <a href="#">5/5/2021</a> | Intervention Request      | FABIAN/YESENIA PEREZ                                    | 341 BARDEN PARKWAY     | CASTROVILLE          | TX    | 78009         | 17  |
| 5     | <a href="#">5/5/2021</a> | Req for intervention/odor | JENNIFER RABIDOUX                                       | 394 BARDEN PARKWAY     | CASTROVILLE          | TX    | 78009         |   |
| 6     | <a href="#">5/5/2021</a> | Intervention Request      | <a href="#">JOHN/KATHLEEN MILLER</a>                    | 431 BARDEN PARKWAY     | CASTROVILLE          | TX    | 78009         |   |
| 7     | <a href="#">5/5/2021</a> | Intervention Request      | TERRY/SHARON RASH                                       | 301 BARDEN PARKWAY     | CASTROVILLE          | TX    | 78009         | 13  |
| 8     | <a href="#">5/6/2021</a> | Intervention Request      | ERIK GARZA  | 225 STONE TRAIL        | CASTROVILLE          | TX    | 78009         |   |
| 9     | <a href="#">5/5/2021</a> | Intervention Request      | THOMAS/MELISSA SCOTT                                    | 271 PAINTED ROSE       | CASTROVILLE          | TX    | 78009         |   |
| 10    | <a href="#">5/5/2021</a> | Intervention Request      | LARRY GALYARDT (ANN WESTMAN IS CUSTOMER)                | 519 BARDEN PARKWAY     | CASTROVILLE          | TX    | 78009         |   |
| 11    | <a href="#">5/5/2021</a> | Intervention Request      | <a href="#">FRANCISCO/ANNA SANDOVAL</a>                 | 252 SUNSET HILL        | CASTROVILLE          | TX    | 78009         |   |
| 12    | <a href="#">5/6/2021</a> | Other Complaint           | MICHAEL/JULIE HERR                                      | 213 SUNSET HILL        | CASTROVILLE          | TX    | 78009         |   |
| 13    | <a href="#">5/5/2021</a> | Req for intervention/odor | DAVID/JOSEFA SLETTEN                                    | 275 SITTRE DRIVE       | CASTROVILLE          | TX    | 78009         |   |
| 14    | <a href="#">5/5/2021</a> | Odor and Noise            | MARY MOORE/JANE HONERMANN                               | 453 BARDEN PARKWAY     | CASTROVILLE          | TX    | 78009         |   |
| 15    | <a href="#">5/5/2021</a> | Intervention Request      | JESUS/SANDRA GONZALEZ                                   | 165 MARY ELLA DR       | CASTROVILLE          | TX    | 78009         |   |
| 16    | <a href="#">5/5/2021</a> | Intervention Request      | <a href="#">JUAN OR MARGARET REYES</a>                  | 295 MARY ELLA DR       | CASTROVILLE          | TX    | 78009         |   |
| 17    | <a href="#">5/5/2021</a> | Intervention Request      | LARRY OR ROBBIE TERRY                                   | 136 JASMINE LEAF       | CASTROVILLE          | TX    | 78009         |   |
| 18    | <a href="#">5/5/2021</a> | Intervention Request      | <a href="#">JOSEPH/ANNA JUAREZ</a>                      | 116 LANTANA PATH       | CASTROVILLE          | TX    | 78009         |   |
| 19    | <a href="#">5/5/2021</a> | Intervention Request      | CARLOS OR THERESA GAITAN                                | 113 CASCADE TRAIL      | CASTROVILLE          | TX    | 78009         |   |
| 20    | <a href="#">5/5/2021</a> | Intervention Request      | KEMPIS & HOPE MCCALL                                    | 134 LOST PINES         | CASTROVILLE          | TX    | 78009         |   |
| 21    | <a href="#">5/6/2021</a> | Req for intervention/odor | RAY OR IMELDA GARCIA                                    | 159 CASCADE TRAIL      | CASTROVILLE          | TX    | 78009         |   |
| 22    | <a href="#">5/5/2021</a> | Intervention Request      | CHRISTOPHER/MELISSA RAY                                 | 156 CASCADE TRAIL      | CASTROVILLE          | TX    | 78009         |   |
| 23    | <a href="#">5/5/2021</a> | Intervention Request      | ALLEN OR ADRIENNE MIMMS                                 | 150 ROUNDTOP HILL      | CASTROVILLE          | TX    | 78009         |   |
| 24    | <a href="#">5/5/2021</a> | Intervention Request      | JUSTIN OR ERIN RUPERT                                   | 145 MARY ELLA DR       | CASTROVILLE          | TX    | 78009         |   |
| 25    | <a href="#">5/5/2021</a> | Intervention Request      | WILLIS / JOAN RAWLS                                     | 239 ROUNDTOP HILL      | CASTROVILLE          | TX    | 78009         | 32  |
| 26    | <a href="#">5/5/2021</a> | Intervention Request      | THOMAS/LEONILA DAVIS                                    | 139 CASCADE TRAIL      | CASTROVILLE          | TX    | 78009         |   |
| 27    | <a href="#">5/5/2021</a> | Intervention Request      | DARLA PARSON / ANNETTE MOORE                            | 298 ROUNDTOP HILL      | CASTROVILLE          | TX    | 78009         |   |
| 28    | <a href="#">5/5/2021</a> | Intervention Request      | DAVID OR MAXINE WARE                                    | 117 ROUNDTOP HILL      | CASTROVILLE          | TX    | 78009         | 26  |
| 29    | <a href="#">5/5/2021</a> | Intervention Request      | MICHAEL/JENNI DOMBROWSKI                                | 244 ROUNDTOP HILL      | CASTROVILLE          | TX    | 78009         |   |
| 30    | <a href="#">5/5/2021</a> | Intervention Request      | DERRICK/KWAJALEIN THOMAS                                | 158 FLOWER MOUND       | CASTROVILLE          | TX    | 78009         |   |
| 31    | <a href="#">5/5/2021</a> | Intervention Request      | <a href="#">RONALD/LYNN BARRON</a>                      | 157 ROUNDTOP HILL      | CASTROVILLE          | TX    | 78009         | 28  |
| 32    | <a href="#">5/5/2021</a> | Intervention Request      | ERIC OR CONNIE LINDBECK                                 | 203 SWEET ROSE         | CASTROVILLE          | TX    | 78009         |   |
| 33    | <a href="#">5/5/2021</a> | Intervention Request      | JOHNNY OR SYNTYA URIEGAS                                | 245 SWEET ROSE         | CASTROVILLE          | TX    | 78009         |   |
| 34    | <a href="#">5/5/2021</a> | Req for intervention/odor | ARTURO/NANCY VARGAS                                     | 164 FLOWER MOUND       | CASTROVILLE          | TX    | 78009         |   |
| 35    | <a href="#">5/5/2021</a> | Intervention Request      | CATHERINE LYNN MONKMAN                                  | 198 LANTANA PATH       | CASTROVILLE          | TX    | 78009         |   |
| 36    | <a href="#">5/5/2021</a> | Intervention Request      | ROBERTO/BRENDA ARTEAGA                                  | 183 LANTANA PATH       | CASTROVILLE          | TX    | 78009         |   |
| 37    | <a href="#">5/5/2021</a> | Intervention Request      | DAVID & XIAOYA YANEZ *PUCT IDENTIFIED AS XINYA SUN YUIZ | 136 LANTANA PATH       | CASTROVILLE          | TX    | 78009         |   |
| 38    | <a href="#">5/5/2021</a> | Intervention Request      | CALVIN/ELIZABETH OWENS                                  | 380 SWEET ROSE         | CASTROVILLE          | TX    | 78009         |   |
| 39    | <a href="#">5/5/2021</a> | Intervention Request      | CHARLES/CHUCK BREADMORE                                 | 226 ROUNDTOP HILL      | CASTROVILLE          | TX    | 78009         |   |
| 40    | <a href="#">5/6/2021</a> | Intervention Request      | RAFAEL/RHONDA GONZALEZ                                  | 422 SWEET ROSE         | CASTROVILLE          | TX    | 78009         |   |
| 41    | <a href="#">5/5/2021</a> | Intervention Request      | ISAAC/VIOLA GUTIERREZ                                   | 442 SWEET ROSE         | CASTROVILLE          | TX    | 78009         |   |
| 42    | <a href="#">5/5/2021</a> | Intervention Request      | ROBERT OR HEATHER MOORE                                 | 557 SWEET ROSE         | CASTROVILLE          | TX    | 78009         |   |
| 43    | <a href="#">5/5/2021</a> | Intervention Request      | JUNE SHILES   | 168 LOST CREEK         | CASTROVILLE          | TX    | 78009         |   |
| 44    | <a href="#">5/5/2021</a> | Req for intervention/odor | JAIME/JEANETTE MARTINEZ                                 | 297 SITTRE DRIVE       | CASTROVILLE          | TX    | 78009         |   |
| 45    | <a href="#">5/3/2021</a> | Req for intervention/odor | CHRISTOPHER/CHRISTINA PINEDO                            | 164 BIG BEND           | CASTROVILLE          | TX    | 78009         |   |
| 46    | <a href="#">5/5/2021</a> | Intervention Request      | ERIC / CAROLINE BELMAR                                  | 300 BIG BEND           | CASTROVILLE          | TX    | 78009         |   |
| 47    | <a href="#">5/5/2021</a> | Intervention Request      | THIAGO/JANAE SERGIO                                     | 321 BIG BEND           | CASTROVILLE          | TX    | 78009         |   |
| 48    | <a href="#">5/5/2021</a> | Intervention Request      | JUAN/MISTY RIOS   | 242 SUNSET HILL        | CASTROVILLE          | TX    | 78009         |   |
| 49    | <a href="#">5/5/2021</a> | Intervention Request      | LUIS FELIPE NETO  | 545 BARDEN PARKWAY     | CASTROVILLE          | TX    | 78009         |   |
| 50    | <a href="#">5/5/2021</a> | Intervention Request      | BRENDAN/BRENDA KUEHL                                    | 181 LAWRENCE DRIVE     | CASTROVILLE          | TX    | 78009         |   |

# DOCKET NO. 51870 - ATTACHMENT A-1

|                                |                  |                        |  |                    |             |    |       |    |
|--------------------------------|------------------|------------------------|--|--------------------|-------------|----|-------|----|
| 51                             | <u>5/6/2021</u>  | Intervention Request   | ANGELA HAYNES  | 365 BARDEN PARKWAY | CASTROVILLE | TX | 78009 | 19 |
| 52                             | <u>5/5/2021</u>  | Intervention Request   | ERIC/SHUANG WINEMAN  | 380 BIG BEND       | CASTROVILLE | TX | 78006 |    |
| 53                             | <u>5/7/2021</u>  | Intervention Request   | JUAN OR MARY RAMIREZ   | 183 BIG BEND       | CASTROVILLE | TX | 78009 |    |
| 54                             | <u>5/7/2021</u>  | Intervention Request   | FREDRICK&CAROLINE NEWELL                                     | 134 CASCADE TRAIL  | CASTROVILLE | TX | 78009 |    |
| 55                             | <u>5/10/2021</u> | Intervention Request   | JEFF/MELISSA DERRYBERRY                                      | 397 SWEET ROSE     | CASTROVILLE | TX | 78009 |    |
| 56                             | <u>5/10/2021</u> | Intervention Request   | WILLIAM/JILL KEMBLE III                                      | 415 SWEET ROSE     | CASTROVILLE | TX | 78009 |    |
| 57                             | <u>5/10/2021</u> | Intervention Request   | BENJAMIN/CAROL SCOTT   | 258 CASCADE TRAIL  | CASTROVILLE | TX | 78009 |    |
| 58                             | <u>5/10/2021</u> | Intervention Request   | FRANKLIN & MARIA SINCHE                                      | 282 CASCADE TRAIL  | CASTROVILLE | TX | 78009 |    |
| 59                             | <u>5/10/2021</u> | Intervention Request   | CALVIN OR FELECIA HOWELL                                     | 216 CASCADE TRAIL  | CASTROVILLE | TX | 78009 |    |
| 60                             | <u>5/10/2021</u> | Intervention Request   | GLENN OR BARBARA GASPARD                                     | 240 CASCADE TRAIL  | CASTROVILLE | TX | 78009 |    |
| 61                             | <u>5/10/2021</u> | Intervention Request   | TRACEY/CHRISTINA LEWIS                                       | 196 CASCADE TRAIL  | CASTROVILLE | TX | 78009 |    |
| 62                             | <u>5/10/2021</u> | Intervention Request   | GARRY/MARIANNE KOSTEL  | 167 STONE TRAIL    | CASTROVILLE | TX | 78009 |    |
| 63                             | <u>5/10/2021</u> | Intervention Request   | DANIEL/PATRICIA FARIAS                                       | 520 SWEET ROSE     | CASTROVILLE | TX | 78009 |    |
| 64                             | <u>5/10/2021</u> | Intervention Request   | RONGI OR DORCIA LANGHAM                                      | 502 SWEET ROSE     | CASTROVILLE | TX | 78009 |    |
| 65                             | <u>5/10/2021</u> | Intervention Request   | GARCIA /SHAMELLE TARVER *PUCT IDENTIFIED AS G TERREN III     | 482 SWEET ROSE     | CASTROVILLE | TX | 78009 |    |
| 66                             | <u>5/10/2021</u> | Intervention Request   | ROBERT GRAHAM  | 541 SWEET ROSE     | CASTROVILLE | TX | 78009 |    |
| 67                             | <u>5/10/2021</u> | Intervention Request   | NACHA CORBETT  | 402 SWEET ROSE     | CASTROVILLE | TX | 78009 |    |
| 68                             | <u>5/10/2021</u> | Intervention Request   | MICHAEL OR MARIA PORTER                                      | 287 CASCADE TRAIL  | CASTROVILLE | TX | 78009 |    |
| 69                             | <u>5/10/2021</u> | Intervention Request   | JAMES BUCKINGHAM   | 333 CASCADE TRAIL  | CASTROVILLE | TX | 78009 |    |
| 70                             | <u>5/10/2021</u> | Intervention Request   | TAURENCE GUY (CASSANDRA HOPKINS CUSTOMER)                    | 313 CASCADE TRAIL  | CASTROVILLE | TX | 78009 |    |
| 71                             | <u>5/10/2021</u> | Intervention Request   | MICHAEL/MORENA NORIEGA                                       | 260 SWEET ROSE     | CASTROVILLE | TX | 78009 |    |
| 72                             | <u>5/10/2021</u> | Intervention Request   | CLARENCE/CHARTAI MCQUEEN                                     | 240 SWEET ROSE     | CASTROVILLE | TX | 78009 |    |
| 73                             | <u>5/10/2021</u> | Intervention Request   | ALLEN OR DEBRA ABREGO  | 176 SWEET ROSE     | CASTROVILLE | TX | 78009 |    |
| 74                             | <u>5/10/2021</u> | Intervention Request   | JOHN OR TERESA LOVERING                                      | 333 SWEET ROSE     | CASTROVILLE | TX | 78009 |    |
| NON CUSTOMER                   |                  |                        |  |                    |             |    |       |    |
| 75                             | 5/4/2021         | Gen Questions / No Req | CHERYL WURZBACH  |                    |             |    |       |    |
| RECEIVED AFTER 5/10/21 TO DATE |                  |                        |  |                    |             |    |       |    |
| 76                             | <u>5/11/2021</u> | Intervention Request   | MYRON OR TIERA FLETCHER                                      | 516 TEXAS BEND     | CASTROVILLE | TX | 78009 |    |
| 77                             | <u>5/11/2021</u> | Intervention Request   | MARK AND JACQUELINE HOPKINS (PATRICK/RUTH BROWN IS CUSTOMER) | 180 RENEE CREEK    | CASTROVILLE | TX | 78010 |    |
| 78                             | <u>5/11/2021</u> | Intervention Request   | OLGA HONERMANN   | 254 STONE TRAIL    | CASTROVILLE | TX | 78011 |    |
| 79                             | <u>5/11/2021</u> | Intervention Request   | TIMOTHY/NORMA GRANDBERRY                                     | 573 BARDEN PARKWAY | CASTROVILLE | TX | 78012 |    |
| 80                             | <u>5/12/2021</u> | Intervention Request   | ERNEST/MARGARET PEREZ  | 186 ROUNDTOP HILL  | CASTROVILLE | TX | 78013 |    |

**DOCKET NO. 51870 - ATTACHMENT B**

**FOREST GLEN UTILITY COMPANY - APPLICATION FOR CCN AMENDMENT  
ATTACHMENT 9**

**DOCKET NO. 51870 - ATTACHMENT B**

From:

Harry Hausman

15720 Bandera Rd. #103

Helotes TX. 78023

To:

Steven Greenberg

Forest Glen Utility

1918 Summerwood

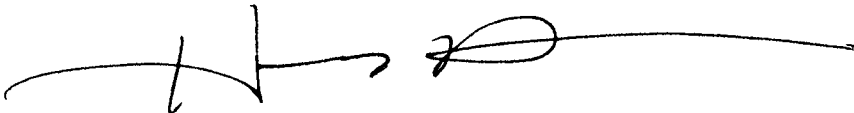
San Antonio, TX 78232

Re: Request for Non-Standard Service for +/- 185 acres on Potranco Road known as Potranco Oaks

Dear Mr. Greenberg,

Attached please find our non-standard service application requesting wastewater treatment service be established to fulfill the needs of the new planned development described in the application.

Sincerely,

A handwritten signature in black ink, consisting of a stylized 'H' followed by a long horizontal line that ends in a small loop.

Harry Hausman

**DOCKET NO. 51870 - ATTACHMENT B**

Forest Glen Utility  
1918 Summerwood Dr  
San Antonio, Texas 78232  
Tel: 210-968-0776

**NON-STANDARD SERVICE APPLICATION**

Select One:

\_\_\_\_\_ Applying for development of new regulated utility retail service

X Applying for service extension

Name of Development: Potranco Oaks / Gardens

Maximum Number of Lots: 388 SFR Total Acreage: 185

Name of Applicant: Hausman Holdings

Name & Title of Person Completing Application: \_\_\_\_\_

Mailing Address: 15720 Bandera Rd #103, Helotes TX 78023

Phone: 210.695.6580

E-mail: marymhoyt@gmail.com

Name of Property Owner: HK Development

Mailing Address: 15720 Bandera Rd #103, Helotes TX 78023

Phone: \_\_\_\_\_

E-mail: \_\_\_\_\_

Responsible Engineer: Paul Landa Firm: MTR Engineers

Mailing Address: \_\_\_\_\_

Phone: \_\_\_\_\_

E-mail: \_\_\_\_\_

Property description: (State legal description or attach copy of deed)

185 acres near the intersection of Potranco Rd and Barden Parkway

Describe all intended land uses in the Development: (Attach additional sheets if necessary)

☒ Residential Subdivision ☐ Apartments ☐ Manufactured Home ☐ RV Park

☐ Commercial or other:

\_\_\_\_\_

