



Control Number: 52016



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PUC DOCKET NO. 52016

PETITION BY COUNTY LINE §
SPECIAL UTILITY DISTRICT FOR §
APPROVAL OF SERVICE AREA §
CONTRACT UNDER TEXAS WATER §
CODE § 13.248 §

RECEIVED
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BEFORE THE
PUBLIC UTILITY COMMISSION
OF TEXAS

BOB WHITE RANCH PARTNERS LP'S MOTION TO INTERVENE

TO THE PUBLIC UTILITY COMMISSION OF TEXAS;;

Bob White Ranch Partners LP ("Bob White Ranch") files this Motion to Intervene pursuant to 16 Texas Administrative Code (TAC) §§ 22.101, 22.103(b), and 22.104, and in support thereof would respectfully show as follows:

1. The name, address, and telephone number of Bob White Ranch's authorized representatives are:

Leonard Dougal
Alicia French
JACKSON WALKER LLP
100 Congress, Suite 1100
Austin, Texas 78701
Telephone: (512) 236-2000
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All pleadings and other documents should be served upon Bob White Ranch's authorized representatives.

2. On April 12, 2021, the County Line Special Utility District ("District") filed a Petition for Approval of Service Area Contract Under Texas Water Code § 13.248 (the "Petition").

3. The subject of the Petition is the Water Service Area Transfer Agreement entered into between the District and Polonia Water Supply Corporation (“Polonia”) dated March 24, 2021, pursuant to TWC § 13.248 and 24 TAC § 24.253 (the “Contract”). As set out in more detail in the Petition, the Contract designates water service areas and customers to be served and transfers a portion of Polonia’s CCN to the District’s CCN (the “Transfer Area”).
4. Bob White Ranch owns the entirety of the property located within the Transfer Area, and the Contract was acknowledged by Bob White Ranch Partners LP as the property owner at page 6.¹
5. As property owner of the area to be transferred, and the entity that will receive water service from the District upon the PUC’s approval of the Contract, the Bob White Ranch has a direct and substantial interest in this proceeding. In recognition of that justiciable interest, the Bob White Ranch seeks leave to intervene as a party in this docket so that it may ensure its interests are protected.

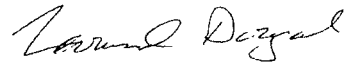
CONCLUSION AND PRAYER

WHEREFORE, PREMISES CONSIDERED, Bob White Ranch Partners LP respectfully requests that this Motion to Intervene be granted so that it may intervene in this docket as a party with all rights thereof, and for such other relief to which it may be justly entitled.

¹ See Exhibit A to the Petition.

Respectfully submitted,

JACKSON WALKER L.L.P.

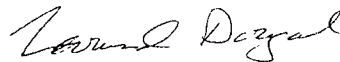


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ATTORNEYS FOR BOB WHITE RANCH
PARTNERS LP

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 April 13, 2021, in accordance with the Order Suspending Rules, issued in Project No. 50664.



Leonard H. Dougal