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DOCKET NO. 52090

2021 JUN -4 AM 9:53

PETITION OF REDBIRD DEVELOPMENT, LLC §  
TO AMEND DOBBIN PLANTERSVILLE §  
WATER SUPPLY CORPORATION'S §  
CERTIFICATE OF CONVENIENCE §  
AND NECESSITY IN MONTGOMERY COUNTY §  
BY EXPEDITED RELEASE §

BEFORE THE  
PUBLIC UTILITY COMMISSION  
OF TEXAS

**DOBBIN PLANTERSVILLE WATER SUPPLY CORPORATION'S**  
**MOTION TO INTERVENE AND**  
**NOTICE OF APPEARANCE**

COMES NOW, Dobbin Plantersville Water Supply Corporation (Dobbin Plantersville) 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, Dobbin Plantersville respectfully shows the following:

**I. MOTION TO INTERVENE**

On May 6, 2021, Redbird Development, LLC, filed with the Public Utility Commission ("PUC") a petition for an expedited release of a portion of Dobbin Plantersville's water CCN 11052 service area.

Dobbin Plantersville has standing to intervene under 16 Texas Administrative Code section 22.103(b). Dobbin Plantersville has justiciable interests that will be adversely affected by the outcome of this proceeding. Specifically, Dobbin Plantersville will lose an unspecified number of acres of its service area upon which it has relied in planning, design, construction, and debt. The petition states that it is less than 388.5 acres.

Dobbin Plantersville has a right to participate that is conferred by Commission rule. Order No. 1 in this docket and Commission rules concerning 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 Dobbin Plantersville, pursuant to 16 Texas Administrative Code section 22.101. Please direct all future communications to the undersigned.

## **III. PRAYER**

WHEREFORE, PREMISES CONSIDERED, Dobbin Plantersville 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*

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**MARY K. SAHS, P.C.**

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**ATTORNEY FOR DOBBIN  
PLANTERSVILLE WATER  
SUPPLY CORPORATION**

## **CERTIFICATE OF SERVICE**

Pursuant to Docket No. 50664, Second Order Suspending Rules (July 16, 2020) the undersigned hereby certifies that a copy of foregoing Dobbin Plantersville Water Supply Corporation's Motion to Intervene and Notice of Appearance was served on all parties of record in this proceeding on June 4, 2021 by electronic mail.

*Mary K. Sahs*

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Mary K. Sahs