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PETITION OF MERITAGE HOMES OF	§	PUBLIC UTILITY COMMISSION
TEXAS, LLC TO AMEND NORTH	§	
COLLIN SPECIAL UTILITY	§	OF TEXAS
DISTRICT'S AND CITY OF MELISSA'S	§	
CERTIFICATES OF CONVENIENCE	§	
AND NECESSITY IN COLLIN	§	
COUNTY BY EXPEDITED RELEASE	§	

NORTH COLLIN SPECIAL UTILITY DISTRICT'S MOTION TO INTERVENE

COMES NOW, NORTH COLLIN SPECIAL UTILITY DISTRICT (North Collin SUD) and files this Motion to Intervene pursuant to 16 Texas Administrative Code (TAC) §22.101, et. seq. In support thereof, North Collin SUD respectfully would show as follows:

1. On June 30, 2021, Meritage Homes of Texas, LLC (Petitioner) filed a petition for streamlined expedited release from the service areas of City of Melissa under Certificate of Convenience and Necessity (CCN) No. 11482 and North Collin SUD's CCN No. 11035, where the property subject to the Petition is approximately 273 contiguous acres in Collin County.¹

2. North Collin SUD has an interest in maintaining its CCN areas and protecting its investments in its infrastructure, and therefore North Collin SUD requests party status to allow it to continue to argue and respond to substantive issues raised in this proceeding. The staff and consulting engineer of North Collin SUD are currently investigating and verifying its water facilities.

3. Because North Collin SUD has a justiciable interest which may be adversely affected by the outcome of the proceeding, the Commission should grant North Collin party status as an intervenor.

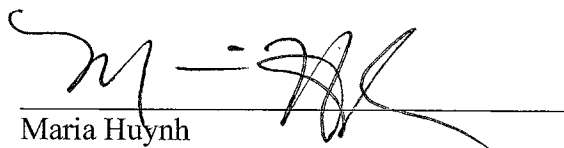
PRAYER

WHEREFORE, PREMISES CONSIDERED, North Collin SUD respectfully requests that the Commission grant its Motion to Intervene to declared it a party to this proceeding, and grant North Collin SUD any further relief to which North Collin SUD is justly entitled.

¹ Petition by Meritage Homes of Texas, LLC for Streamlined Expedited Release pursuant to Texas Water Code Section 13.2541, at 1-2 (Jun. 30, 2021).

Respectfully submitted,

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ATTORNEYS FOR NORTH COLLIN
SPECIAL UTILITY DISTRICT

CERTIFICATE OF SERVICE

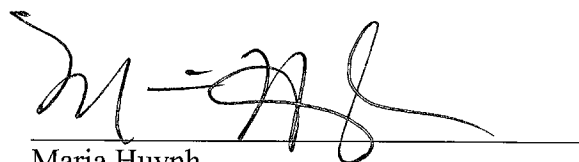
I certify that a true and correct copy of this document was served on the following parties of record on August 3, 2021, in accordance with 16 TAC § 22.74.

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