

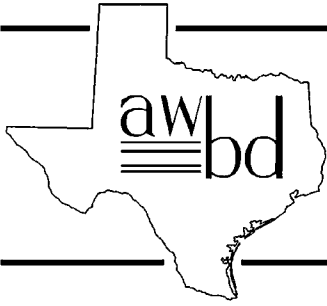


Filing Receipt

Received - 2022-06-01 03:38:42 PM

Control Number - 52405

ItemNumber - 15



ASSOCIATION OF WATER BOARD DIRECTORS - TEXAS

"Dedicated to the betterment of Texas water district operation and management through education, unification, and advocacy."

June 1, 2022

The Honorable Commissioners
Public Utility Commission of Texas
P.O. Box 13326
Austin, Texas 78711-3326

Via electronic submission

Re: Reply Comments - Rule Project No. 52405

Dear Commissioners:

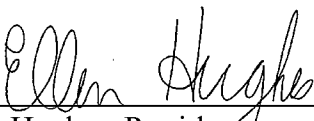
The Association of Water Board Directors ("AWBD"), commented on the referenced project implementing certain provisions of Senate Bill 3 ("SB 3") from the 87th Texas Legislature, as codified in §13.151 and §13.414 of the Texas Water Code.


AWBD supports the comments of the Texas Rural Water Association ("TRWA") and comments filed by Allen Boone Humphries & Robinson and Schwartz Page & Harding regarding proposed rules in Title 16 Texas Administrative Code §§ 24.173 and 24.364. Collectively, AWBD and TRWA represent millions of Texans and cover most of the unincorporated water utility service areas in Texas. Like TRWA, AWBD believes that our members, and ultimately the customers served by our members, would be harmed by the inconsistencies between the rules and the related statute.

Thanks to you and PUCT staff for considering all comments, including this letter, and the agency's efforts to fairly regulate utilities across Texas consistent with state law. Please feel free to contact us with any comments or questions.

Very truly yours,

ASSOCIATION OF WATER BOARD
DIRECTORS – TEXAS

By: 
Ellen Hughes, President

By: 
Augustus Campbell, Executive Director