



Filing Receipt

Received - 2021-09-23 02:04:32 PM
Control Number - 52410
ItemNumber - 22

PUC DOCKET NO. 52410

APPLICATION OF CSWR-TEXAS	§	PUBLIC UTILITY COMMISSION
UTILITY OPERATING COMPANY,	§	
LLC AND LEON SPRINGS UTILITY	§	
COMPANY, INC. FOR SALE,	§	OF TEXAS
TRANSFER OR MERGER OF	§	
FACILITIES AND CERTIFICATE	§	
RIGHTS IN BEXAR COUNTY	§	

**MOTION TO INTERVENE OF
THE DOMINION HOMEOWNERS ASSOCIATION**

The Dominion Homeowners Association (“Dominion”) moves to intervene in this docket pursuant to Tex. Water Code § 13.301 and 16 Tex. Admin. Code (“TAC”) § 22.103.

I. Background

On August 10, 2021, CSWR-Texas Utility Operating Company, LLC (“CSWR”) and Leon Springs Utility Company, Inc. (“Leon Springs”) applied for Public Utility Commission of Texas (“Commission”) approval of a sale and transfer of Leon Springs’s wastewater system to CSWR. That wastewater system serves 1,209 connections spread over approximately 1,419 acres in Bexar County, Texas. Leon Springs provides service under Certificate of Convenience and Necessity No. 20614, which Leon Springs seeks to transfer to CSWR as part of the sale transaction.

Dominion is a homeowners association whose members are served by the Leon Springs wastewater system. To Dominion’s knowledge, the Leon Springs wastewater system does not serve any customers other than those located in the Dominion subdivision.

II. Motion to Intervene

The names, addresses and telephone numbers of Dominion’s authorized representatives in this proceeding are:

Rob McDaniel, PCAM
General Manager
The Dominion Homeowners Association
20 Dominion Drive, San Antonio, TX 78257
Phone: (210) 698-1232
Email: generalmanager@dominionhoa.com

Ron H. Moss
Winstead PC
401 Congress Avenue, Suite 2100
Austin, Texas 78701
Phone: (512) 370-2867
Facsimile: (512) 370-2850
Email: rhmoss@winstead.com

All pleadings and other documents should be served upon Dominion's authorized representatives.

16 TAC § 22.103 provides that a person has standing to intervene if that person has or represents persons with a justiciable interest which may be adversely affected by the outcome of the proceeding. Dominion is an association that exists to represent the interests of homeowners in the Dominion subdivision, all of which will be adversely affected by the outcome of this proceeding if CSRW lacks the financial means or operational expertise to manage the wastewater system effectively and efficiently. Accordingly, Dominion has standing to intervene.

For these reasons, Dominion requests that the Commission grant this Motion to Intervene and admit Dominion as an Intervenor for all purposes. Dominion further requests any other relief to which it may be entitled.

Respectfully submitted,

WINSTEAD PC

By: /s/ Ron H. Moss

Ron H. Moss
State Bar No. 14591025
rhmoos@winstead.com
401 Congress Avenue, Suite 2100
Austin, Texas 78701
Telephone: (512) 370-2800
Facsimile: (512) 370-2850

**ATTORNEYS FOR
DOMINION HOMEOWNERS ASSOCIATION**

CERTIFICATE OF SERVICE

This document was filed on the Commission's Interchange website on September 23, 2021. In accordance with Order No. 2 in this docket, Dominion has notified all parties of this pleading by email.

/s/ Ron H. Moss
Ron H. Moss