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DOCKET NO. 52696

PETITION OF FIRMITAS	§	BEFORE THE
INVESTMENTS, LLC TO AMEND	§	
GUADALUPE-BLANCO RIVER	§	
AUTHORITY’S CERTIFICATE OF	§	PUBLIC UTILITY COMMISSION
CONVENIENCE AND NECESSITY IN	§	
COMAL COUNTY	§	
BY EXPEDITED RELEASE	§	OF TEXAS

GUADALUPE-BLANCO RIVER AUTHORITY’S MOTION TO INTERVENE

COMES NOW, the Guadalupe-Blanco River Authority (“GBRA”) and files this Motion to Intervene in response to Petitioner Firmitas Investments, LLC’s (“Petitioner”) Petition to Amend Guadalupe-Blanco River Authority’s Certificate of Convenience and Necessity (CCN) No. 20892 by Streamlined Expedited Release (“Petition”) filed pursuant to Texas Water Code § 13.2541. The Petition seeks decertification from GBRA’s CCN No. 20892 approximately 100 acres located in Comal County, Texas (“Property”). Order No. 1 in this docket establishes a deadline of November 18, 2021 for GBRA to respond to the Petition. Therefore, this motion is timely filed.

Should the Petition be granted, GBRA will be deprived of the exclusive right to provide retail sewer service to the Property and GBRA may be entitled to compensation for real and personal property as a result of the granting of the Petition. Thus, GBRA seeks to participate in this proceeding as an Intervenor. Under the Public Utility Commission’s rules, a person has standing to intervene if that person has (1) a right to participate which is expressly conferred by statute or commission rule or order, or (2) a justiciable interest which may be adversely affected by the outcome of the proceeding. *See* 16 Tex. Admin. Code § 22.103(b).

GBRA has a right to participate as provided by Texas Water Code § 13.2541 and 16 Tex. Admin. Code § 24.245(h) and (i). GBRA also has a justiciable interest in maintaining its CCN and protecting its investments in its sewer facilities that may be adversely affected by the outcome

of this proceeding, including any determination regarding compensation owed to GBRA as a result of the decertification of the Property from GBRA's CCN. Thus, GBRA has a right to intervene in this Proceeding and be named a party.

GBRA respectfully requests that the Commission grant GBRA's Motion to Intervene and make GBRA a party to this proceeding, and grant GBRA any further relief to which GBRA may be entitled.

Respectfully submitted,

**ATTORNEY FOR GUADALUPE-BLANCO
RIVER AUTHORITY**

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BY: *Emily W. Rogers*
Emily W. Rogers

CERTIFICATE OF SERVICE

I certify that this pleading was provided to all parties of record via electronic mail or regular mail on November 15, 2021 in accordance with the Order Suspending Rules, issued in Project No 50664.

Emily W. Rogers
Emily W. Rogers