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PUC DOCKET NO. 52797

APPLICATION OF CONROE RESORT UTILITIES, LLC AND UNDINE DEVELOPMENT LLC FOR SALE, TRANSFER, OR MERGER OF FACILITIES AND CERTIFICATE RIGHTS IN MONTGOMERY COUNTY	§ § § § §	PUBLIC UTILITY COMMISSION OF TEXAS
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**OFFICE OF PUBLIC UTILITY COUNSEL'S
MOTION TO INTERVENE**

Pursuant to Texas Water Code § 13.017(b) and 16 Texas Administrative Code ("TAC") § 22.103(b), the Office of Public Utility Counsel ("OPUC") moves to intervene in this proceeding as a matter of right on behalf of the residential and small commercial consumers in Undine Development, LLC's service territory. The deadline for intervention was February 28, 2022. However, OPUC was not required to be noticed as a part of the application. Following review, OPUC's Interim Chief Executive and Public Counsel has determined that residential and small commercial consumers in Undine Development LLC's service territory are in need of representation in this proceeding. Therefore, OPUC has standing to participate in this proceeding that is expressly conferred by statute. OPUC does not believe that its intervention will prejudice or harm any current party.

Dated: April 1, 2022

Respectfully submitted,

Chris Ekoh
Interim Chief Executive & Public Counsel
State Bar No. 06507015



Renee Wiersema
Assistant Public Counsel
State Bar No. 24094361
Zachary Stephenson
Senior Assistant Public Counsel
State Bar No. 24073402

1701 N. Congress Avenue, Suite 9-180
P.O. Box 12397
Austin, Texas 78711-2397
512-936-7500 (Telephone)
512-936-7525 (Facsimile)
renee.wiersema@opuc.texas.gov (Service)
zachary.stephenson@opuc.texas.gov (Service)
opuc_eservice@opuc.texas.gov (Service)

**ATTORNEYS FOR THE OFFICE OF
PUBLIC UTILITY COUNSEL**

CERTIFICATE OF SERVICE
PUC DOCKET NO. 52797

I hereby certify that a copy of the foregoing document was served on all parties of record in this proceeding on this 1st day of April 2022, by facsimile, electronic mail, and/or first class, U.S. Mail.



Renee Wiersema