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DOCKET NO. 52993

PETITION OF 33549 LAND GROUP LLC TO AMEND MANVILLE WATER SUPPLY CORPORATIONS CERTIFICATE OF CONVENIENCE AND NECESSITY IN WILLIAMSON COUNTY, TEXAS BY STREAMLINED EXEDITED RELEASE UNDER TEXAS WATER CODE 13.2541 AND 16 TAC 24.245(h)	☺ ☺ ☺ ☺	PUBLIC UTILITY COMMISSION OF TEXAS
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MANVILLE WATER SUPPLY CORPORATION’S MOTION TO INTERVENE

COMES NOW, MANVILLE WATER SUPPLY CORPORATION (“Manville”) and files this its Motion to Intervene in response to the Petition of 3349 Land Group LLC to amend Manville Water Supply Corporation’s Water Certificate of Convenience and Necessity No. 11144 in Williamson County, Texas, by Streamlined Expedited Release under Texas Water Code 13.2541 and TAC 24.245(h). The Petitioner seeks decertification from Manville’s CCN 11144 of approximate 113.608 acres of land located in Williamson County, Texas. (The “Property”) Order No. 2 in this Docket establishes a deadline of February 9, 2022, for response to the Petition. Therefore, this motion is timely filed.

Should the Petition be granted, Manville will be deprived of the exclusive right to provide retail water service to the Property and Manville may be entitled to compensation for real and personal property as a result of granting of the Petition. Thus, Manville seeks to participate in this proceeding as an Intervenor and a party. Under the rules of the PUC, intervention is permissible if a potential intervenor has (1) a right to participate which is expressly conferred by statute or by commission rule or order, or (2) a justiciable interest which may be adversely affected by the outcome of the proceeding. 16 TAC 22.103(b).

Manville has a right to participate as provided by Texas Water Code 13.2541 and 16 TAC 24.245 (h) and (i). Manville further has a justiciable interest

in maintaining its CCN and protecting its investment in water facilities, supply, and infrastructure that may be adversely affected by the outcome of this proceeding, including any determination regarding compensation owed to Manville as a result of decertification of the Property from Manville's CCN. Manville is further entitled to assert its protection under 7 USC 1926(b).

Manville respectfully requests that its Motion to Intervene be granted, that Manville be accorded party status to the proceeding, and that Manville be granted such other and further relief to which it might show itself entitled.

Respectfully Submitted,

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ATTORNEYS FOR MANVILLE
WATER SUPPLY CORPORATION

Certificate of Service

I certify that this pleading was provided to all parties of record via electronic mail on March 7, 2022, in accordance with the current Order Suspending Rules.

Karl H. Moeller