



## Filing Receipt

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<b>PETITION OF 3349 LAND GROUP,</b>	<b>§</b>	<b>PUBLIC UTILITY COMMISSION</b>
<b>LLC TO AMEND MANVILLE WATER</b>	<b>§</b>	
<b>SUPPLY CORPORATION'S</b>	<b>§</b>	<b>OF TEXAS</b>
<b>CERTIFICATE OF CONVENIENCE</b>	<b>§</b>	
<b>AND NECESSITY IN WILLIAMSON</b>	<b>§</b>	
<b>COUNTY BY STREAMLINED</b>	<b>§</b>	
<b>EXPEDITED RELEASE</b>	<b>§</b>	

**3349 LAND GROUP, LLC'S RESPONSE TO COMMISSION STAFF'S  
RECOMMENDATION AND MANVILLE WSC'S MOTION TO INTERVENE**

COMES NOW, 3349 Land Group, LLC (3349 Land Group), by and through its undersigned attorneys of record, and files this Response to Commission Staff's Recommendation and Manville WSC's Motion to Intervene (Response), and in support thereof, would respectfully show as follows:

**I. BACKGROUND**

On December 17, 2021, 3349 Land Group filed a petition for streamlined expedited release from Manville Water Supply Corporation's (Manville WSC) water Certificate of Convenience and Necessity (CCN) No. 11144 under Texas Water Code (TWC) § 13.2541(b) and 16 Texas Administrative Code (TAC) § 24.245(h) (the Petition) at the Public Utility Commission of Texas (the Commission). The Petition requests to decertify approximately 114 acres from Manville WSC's water CCN (the Requested Property). The Administrative Law Judge (ALJ) issued Order No. 2 on January 2, 2022, finding the petition, as supplemented, administratively complete, and establishing a deadline of February 23, 2022 for the petitioner to file a reply to the CCN holder's response and Commission Staff's recommendation on final disposition. Manville WSC filed a Motion to Intervene on February 7, 2022, responding that Manville WSC may be entitled to compensation if the Petition is granted. Commission Staff filed its recommendation on final

disposition on February 23, 2022, recommending to grant the Petition. Thus, this Response is timely filed.

## **II. RESPONSE**

3349 Land Group supports Commission Staff's recommendation to approve the Petition. The Petition has satisfied the requirements of TWC § 13.2541(b) and 16 TAC § 24.245(h) for streamlined expedited release.

3349 Land Group recognizes that it must work with Manville WSC after the Petition has been granted to determine the amount of compensation owed to Manville WSC for the Requested Property, if any, as required by TWC §§ 13.254(g) and 13.2541(g)-(i).

## **III. CONCLUSION AND PRAYER**

Based on the foregoing, 3349 Land Group respectfully requests that the ALJ approve the Petition and grant all other relief as is necessary and proper to effectuate the requests contained herein.

Respectfully submitted,

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**ATTORNEYS FOR 3349 LAND GROUP, LLC**

**CERTIFICATE OF SERVICE**

I hereby certify that, unless otherwise ordered by the presiding office, notice of the filing of this document was provided to all parties of record via electronic mail on February 25, 2022, in accordance with the Orders Suspending Rules issued in Project No. 50664.

  
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Danielle Lam