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**APPLICATION OF CSWR-TEXAS
UTILITY OPERATING COMPANY,
LLC AND PATTERSON WATER
SUPPLY, LLC FOR SALE, TRANSFER
OR MERGER OF FACILITIES AND
CERTIFICATE RIGHTS IN DALLAS,
DENTON, PARKER, TARRANT, AND
WISE COUNTIES**

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**PUBLIC UTILITY COMMISSION
OF TEXAS**

**JOINT RESPONSE TO ORDER NO. 24 REQUIRING ADDITIONAL CLARIFICATION
AND SUPPLEMENTAL MOTION TO ADMIT EVIDENCE**

CSWR-Texas Utility Operating Company, LLC (“CSWR Texas”) and Staff of the Public Utility Commission of Texas file this Response to Order No. 24. Order No. 24 set a deadline of March 13, 2024 to provide the requested information. Therefore, this response is timely filed.

I. RESPONSE TO ORDER NO. 24 REQUIRING CLARIFICATION

Order No. 24 requested clarification on several issues. The clarification requests and responses are listed below.

A. Indicate where the amendment of Patterson’s CCN is addressed and whether an amended map, certificate or tariff for Patterson should be provided

To clarify, a portion of Patterson’s water facilities and service area are being transferred. In the Application at pages 2 and 3, boxes are checked that a portion of the CCN is being transferred. Because only a portion of Patterson’s CCN is being transferred in this application, Patterson’s CCN will need to be amended to reflect the partial transfer. The parties provided updated maps, tariffs, and certificates for Patterson, which reflected the partial transfer in the June 2, 2023 Joint Supplemental Motion to Admit Evidence and Proposed Notice of Approval, and these items were admitted into the record on July 31, 2023, in Order No. 16.

B. Dual certification issues

An amended certificate is not required for the City of Denton’s (Denton) water CCN number because Patterson already had dual certification of 78 acres with Denton, and only those acres were transferred to CSWR-Texas. Thus, there are no changes to Denton’s CCN facilities or boundaries. The parties confirm that the 78 acres of dual certification are contained in requested

area number three, the Vacation Village Subdivision in Denton County. The notice did not specifically mention that the area would be dually certified. Staff does not believe additional notice is necessary as Denton was provided notice as an adjacent utility that a transfer of Patterson's acreage to CSWR-Texas was going to occur as a result of the application.

C. Revised maps

The revised maps for CSWR-Texas were filed as the fifth supplement to the Application. The final maps were attached to the Joint Proposed Notice of Approval filed on June 2, 2023, which were admitted into the record on July 31, 2023, in Order No. 16.

II. SUPPLEMENTAL JOINT MOTION TO ADMIT EVIDENCE

To the extent necessary for further adjudication of this proceeding and issuance of an order allowing this transaction to proceed, CSWR-Texas and Staff respectfully request that this responsive pleading be admitted into the record.

III. CONCLUSION

CSWR-Texas and Staff respectfully request that the ALJ (1) grant the supplemental joint motion to admit evidence, to the extent necessary; (2) issue a notice of approval, and (3) grant the Company such other relief to which it has shown itself to be justly entitled.

Respectfully submitted,

**ATTORNEYS FOR CSWR-TEXAS
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CERTIFICATE OF SERVICE

I hereby certify that on this 13th day of March 2024, a true and correct copy of the foregoing document was served on all parties of record via electronic mail in accordance with the Second Order Suspending Rules issued in Project No. 50664.



Wendy K. L. Harvel