



Filing Receipt

Received - 2022-07-20 02:08:56 PM

Control Number - 53765

ItemNumber - 10

PUC DOCKET NO. 53765

APPLICATION OF CRYSTAL	§	PUBLIC UTILITY COMMISSION
SYSTEMS TEXAS, LLC AND UNDINE	§	
TEXAS, LLC FOR SALE, TRANSFER,	§	OF TEXAS
OR MERGER OF FACILITIES AND	§	
CERTIFICATE RIGHTS IN SMITH	§	
COUNTY	§	

**OFFICE OF PUBLIC UTILITY COUNSEL'S
MOTION TO INTERVENE**

Pursuant to Texas Water Code § 13.017(b), and 16 Texas Administrative Code § 22.103(b), the Office of Public Utility Counsel ("OPUC") moves to intervene in this proceeding as a matter of right on behalf of residential and small commercial consumers in Crystal Systems Texas, Inc.'s ("Crystal") service territory.¹ OPUC's Interim Chief Executive and Public Counsel has determined that residential and small commercial consumers in Crystal'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.

Date: July 20, 2022

Respectfully submitted,

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

Sharbel A. Sfeir

Sharbel A. Sfeir
Assistant Public Counsel
State Bar No. 24071204

¹ *Application Of Crystal Systems Texas, LLC And Undine Texas, LLC For Sale, Transfer, or Merger of Facilities and Certificate Rights in Smith County, Docket 53765 (July 1, 2022).* OPUC notes a corporate designation discrepancy between the case style and the application for Crystal Systems Texas. The transferor listed in the application is described as Crystal Systems Texas, Inc. (CCN No. 10804), while the case style refers to a Crystal Systems Texas LLC. OPUC has elected to refer to the entity in the case style as Crystal Systems Texas, Inc. within its Motion to Intervene.

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

ATTORNEYS FOR THE
OFFICE OF PUBLIC UTILITY COUNSEL

CERTIFICATE OF SERVICE

PUC DOCKET NO. 53765

I hereby certify that a copy of the foregoing document was served on all parties of record in this proceeding on this 20th day of July 2022 by facsimile, electronic mail, and/or first class, U.S. Mail.

Sharbel A. Sfeir

Sharbel A. Sfeir