



## Filing Receipt

**Received - 2022-11-03 04:58:14 PM**  
**Control Number - 53936**  
**ItemNumber - 17**

**PUC DOCKET NO. 53936**

<b>APPLICATION OF STONETOWN</b>	<b>§</b>	<b>PUBLIC UTILITY COMMISSION</b>
<b>SPRING OAKS UTILITIES, LLC AND</b>	<b>§</b>	
<b>TRINITY SO PTN, LP FOR SALE,</b>	<b>§</b>	<b>OF TEXAS</b>
<b>TRANSFER, OR MERGER OF</b>	<b>§</b>	
<b>FACILITIES AND CERTIFICATE</b>	<b>§</b>	
<b>RIGHTS IN HARRIS COUNTY</b>	<b>§</b>	

**STONETOWN SPRING OAKS UTILITIES, LLC**  
**PROOF OF NOTICE**

Stonetown Spring Oaks Utilities, LLC (“Spring Oaks”) submits this Proof of Notice in response to Order No. 4, which was issued in this proceeding on September 30, 2022. Order No. 4 directed Spring Oaks to submit this Proof of Notice by November 14, 2022. Therefore, this pleading is timely filed.

Attached to this pleading as “Exhibit 1” is an Affidavit of Notice to Neighboring Utilities, Districts, Cities, and Affected Parties along with a copy of the example notice, including the maps that were attached to the notice, and a list of all recipients to whom notice was provided, including those entities Staff specifically requested Spring Oaks to notify. Also attached as “Exhibit 2,” is an Affidavit of Notice to Current Customers attesting to the service of individual notice to all current customers at the time notice was provided, as well as an example of the notice provided, including the maps that were attached to the notice. The notice and proof of notice are provided in the form and manner described by Ms. Mathis’ memorandum attached to Commission Staff’s recommendation issued on September 30, 2022. Notice to neighboring utilities, districts, cities, and affected parties was mailed on October 18, 2022 and notice to all current customers was mailed on October 19, 2022.

With regard to the example notice included in Exhibit 2, the notice to current customers provides October 20, 2022 as the “Date Notice Mailed” at the top of the form. However, the Affidavit of Notice to Current Customers correctly states that notice to current customers was mailed on October 19, 2022. Due to this inconsistency, and to the extent it is deemed necessary by the Administrative Law Judge (“ALJ”), Spring Oaks respectfully requests a good cause exception under 16 Texas Administrative Code (“TAC”) § 24.2(b) because while 16 TAC

§ 24.239(c) requires notice to be provided “on the form prescribed by the commission,” the notice mailed to current customers on October 19, 2022 meets all the requirements specified in 16 TAC § 24.239(c)(1)(A)-(D). Consequently, there is no substantive or procedural harm that results from the notice being mailed one day earlier than stated on the form notice. Spring Oaks has conferred with Commission Staff who has indicated that it supports the granting of a good cause exception.

Therefore, Spring Oaks respectfully requests that the ALJ issue an order deeming the notice provided to neighboring utilities, districts, cities, affected parties, and current customers sufficient and, to the extent necessary, granting Spring Oaks’ request for a good cause exception.

Respectfully submitted,

JACKSON WALKER L.L.P.



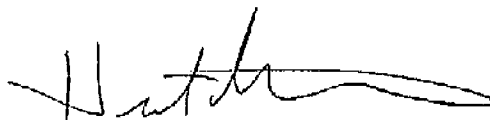
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Heath D. Armstrong  
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100 Congress Avenue, Suite 1100  
Austin, Texas 78701  
Telephone: (512) 236-2098  
Facsimile: (512) 391-2112  
Email: harmstrong@jw.com

**ATTORNEY FOR STONETOWN  
SPRING OAKS UTILITIES, LLC**

**CERTIFICATE OF SERVICE**

I certify that notice of the filing of this document was provided to all parties of record via electronic mail on November 3, 2022, in accordance with the Order Suspending Rules, issued in Project No. 50664.



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Heath D. Armstrong

# PUBLIC UTILITY COMMISSION OF TEXAS



AFFIDAVIT OF NOTICE TO NEIGHBORING UTILITIES, DISTRICTS,  
CITIES, AND AFFECTED PARTIES  
DOCKET NO. 53936

STATE OF TEXAS  
COUNTY OF TRAVIS

Stonetown Spring Oaks Utilities, LLC has provided individual notice (See Attachment A as an example notice and the maps showing the requested area) to the following Neighboring Utilities, Districts, Cities and Affected Parties:

DATE OF NOTICE

Attachment B – List of Neighboring Utilities, Districts,  
Cities, and Affected Parties

October 18, 2022

## OATH

I, Donna Brown Willis being duly sworn, file this form as an authorized representative of Stonetown Spring Oaks Utilities, LLC (indicate relationship to applicant, that is, owner, member of partnership, title of officer of corporation, or other authorized representative of applicant); that in such capacity, I am qualified and authorized to file and verify such form, am personally familiar with the notices given with this application, and have complied with all notice requirements in the application and application acceptance letter; and that all such statements made and matters set for therein are true and correct.

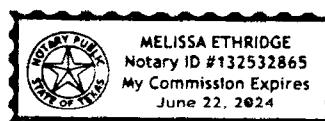
Donna Brown Willis  
Applicant's Authorized Representative

If the applicant to this form is any person other than the sole owner, partner, officer of the applicant, or its attorney, a properly verified Power of Attorney must be enclosed.

Subscribed and sworn to before me this 3rd day of November, 2022, to certify which witness my hand and seal of office.

[Signature]  
Notary Public in and for the State of Texas

Melissa Ethridge  
Print or Type Name of Notary Public



Commission Expires 6/22/2024

***Docket No. 53936***

***Notice to Current Customers, Neighboring Systems, and Cities***

STONETOWN SPRING OAKS UTILITIES, LLC, NOTICE OF INTENT TO PURCHASE WATER AND SEWER FACILITIES, TO TRANSFER ALL OF THE WATER AND SEWER SERVICE AREA UNDER CERTIFICATES OF CONVENIENCE AND NECESSITY (CCN) NOS. 13240 AND 21089 FROM TRINITY SO PTN LP, AND OBTAIN NEW WATER AND SEWER CCN NUMBERS IN HARRIS COUNTY, TEXAS

To:  
«Name»  
«Address»  
«City» «State»«Zip»

Date Notice Mailed: October 18, 2022

<u>Stonetown Spring Oaks Utilities, LLC</u>	<u>211 E. 7<sup>th</sup> St. Suite 620</u>	<u>Austin, TX</u>	<u>78701</u>
(Stonetown Spring Oaks Utilities, LLC's Name)	(Address)	(City), (State)	(Zip Code)

has submitted an application with the Public Utility Commission of Texas (Commission) to purchase all of the water and sewer facilities and to transfer all of the water and sewer certificated service area under water CCN No. 13240 and sewer CCN No. 21089 and obtain new water and sewer CCN numbers in Harris County, TX from:

<u>Trinity SO PTN LP</u>	<u>22014 Spring Oaks Dr.</u>	<u>Spring, TX</u>	<u>77389</u>
(Trinity SO PTN LP's Name)	(Address)	(City), (State)	(Zip Code)

The sale is scheduled to take place if approved by the Commission (Texas Water Code § 13.301). The transaction and the transfer of the CCN includes the following subdivision:  
Trinity Spring Oaks RV and Mobile Home Park.

The requested area includes 137 customer connections, is located approximately 4 mile(s) west of downtown Spring, Texas, and is generally bounded on the north by Crosley Field Drive; on the east by Mossy Oaks Road; on the south by Spring Stuebner Road; and on the west by Frassati Way.

The requested area includes approximately 21 acres, comprised of transferred area from Trinity SO PTN LP (CCN Nos. 13240 & 21089) to Stonetown Spring Oaks Utilities, LLC new water and sewer CCN numbers.

The application proposes the subtraction of approximately 21 acres from CCN Nos. 13240 & 21089 and the addition of approximately 21 acres to Stonetown Spring Oaks Utilities, LLC new water and sewer CCN numbers.

**See enclosed maps showing the requested area.**

This transaction will not have an effect on the current customer's rates and services.

*Persons who wish to intervene in the proceeding or comment upon action sought should contact the Public Utility Commission, P.O. Box 13326, Austin, Texas 78711-3326, or call the Public Utility Commission at (512) 936-7120 or (888) 782-8477. Hearing- and speech-impaired individuals with text telephones (TTY) may contact the commission at (512) 936-7136. The deadline for intervention in the proceeding is (30 days from the mailing or publication of notice, whichever occurs later, unless otherwise provided by the presiding officer). You must send a letter requesting intervention to the commission which is received by that date. The letter must include the person's name, address, email address and fax number if applicable.*

If a valid public hearing is requested, the Commission will forward the application to the State Office of Administrative Hearings (SOAH) for a hearing. If no settlement is reached and an evidentiary hearing is held, SOAH will submit a recommendation to the Commission for final decision. An evidentiary hearing is a legal proceeding similar to a civil trial in state district court.

Si desea información en español, puede llamar al 1-888-782-8477.

Maxwell Key  
Utility Representative

Stonetown Spring Oaks Utilities, LLC  
Utility Name



# ATTACHMENT J-1



## Requested Area to Transfer from Trinity SO PTN, LP (CCN Nos. 13240 & 21089) to Stonetown Spring Oaks Utilities, LLC New Water and Sewer CCN Numbers

### MAP LEGEND:



Requested Area to transfer  
from Trinity SO PTN, LP  
to Stonetown Spring Oak Utilities, LLC

MAP SCALE: 1" = 5,500'

0 0.5 1 2 Miles

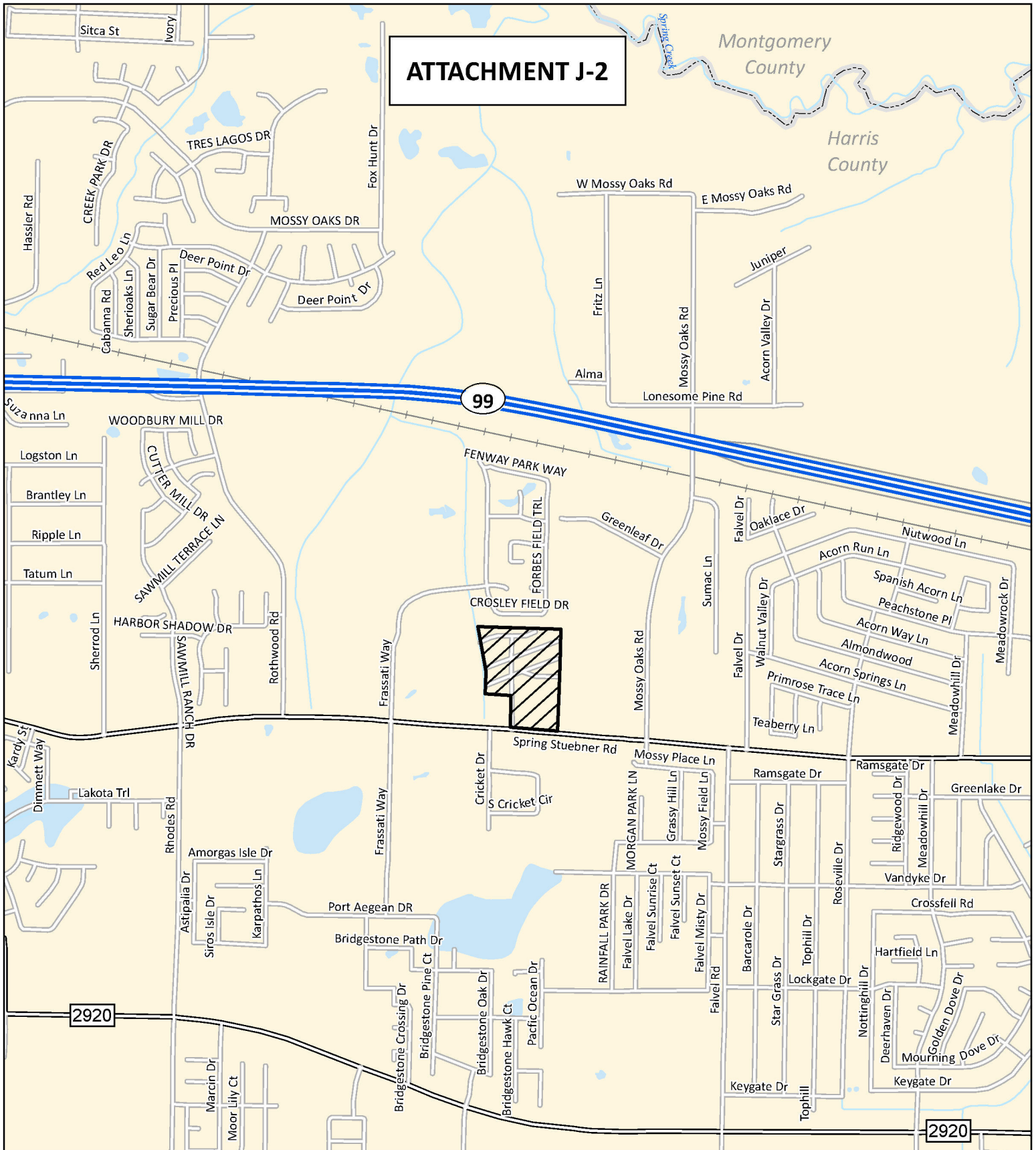
August 30, 2022

Requested area is located east of Frassati Way,  
south of SH 99, west of Mossy Oaks Road,  
and north of Spring Stuebner Rd.

Harris County, TX



# ATTACHMENT J-2



**Requested Area to Transfer**  
**from Trinity SO PTN, LP (CCN Nos. 13240 & 21089)**  
**to Stonetown Spring Oaks Utilities, LLC**  
**New Water and Sewer CCN Numbers**

## MAP LEGEND:



Requested Area to transfer  
 from Trinity SO PTN, LP  
 to Stonetown Spring Oak Utilities, LLC

**MAP SCALE: 1" = 1,500'**

0 750 1,500 3,000 Feet

August 30, 2022

Requested area is located east of Frassati Way,  
 south of SH 99, west of Mossy Oaks Rd,  
 and north of Spring Stuebner Rd.

Harris County, TX



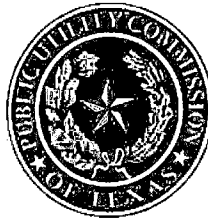
**Attachment B - Springs Oaks Utilities List of Cities,  
Districts, and Neighboring Retail Public Utilities**

**ATTACHMENT B**

<b>Name</b>	<b>Address</b>	<b>City</b>	<b>State</b>	<b>Zip</b>
Aqua Texas Inc.	1106 Clayton Lane, Suite 400W	Austin	TX	78723
J&S Water Company LLC	8010 Thompson Road	Highlands	TX	77562
T & W Water Service Company	P. O. Box 2927	Conroe	TX	77305
Undine Texas LLC	17681 Telge Road	Cypress	TX	77429
Bridgestone MUD	2929 Allen Parkway Suite 3450	Houston	TX	77019
	Radcliffe, Bobbitt, Adams & Polley, PLLC			
Bridgestone MUD	1001 McKinney Suite 1000	Houston	TX	77002
Dove Meadows MUD	1621 Milam St. Fl 3	Houston	TX	77002
Dove Meadows MUD	2200 Sciaaca Road	Spring	TX	77373
Encanto Real Utility District	3700 Buffalo Speedway, Suite 830	Houston	TX	77098
H-M-W Special Utility District	P. O. Box 837	Pinehurst	TX	77362
Harris County Flood Control District	9900 Northwest Freeway	Houston	TX	77092
Harris County Improvement District 18	3200 Southwest Freeway Suite 2600	Houston	TX	77027
	Allen Boone Humphries Robinson LLP			
Harris County Improvement District 18	1300 Post Oak Blvd. Suite 1400	Houston	TX	77056
Harris County MUD 104	2727 Allen Parkway Suite 1100	Houston	TX	77019
Harris County MUD 104	P. O. Box 890466	Houston	TX	77289
Meadowhill Regional MUD	2929 Allen Parkway, Suite 3150	Houston	TX	77019
	Johnson, Radcliffe, Petrov & Bobbitt, LLC			
Meadowhill Regional MUD	1621 Milam St. Floor 3	Houston	TX	77002
Montgomery County WCID 1	P. O. Box 7690	The Woodlands	TX	77387
Montgomery County MUD 46	2455 Lake Robbins Dr.	The Woodlands	TX	77380
Montgomery County MUD 46	P. O. Box 7580	Spring	TX	77387
Northwest Harris County MUD 28	1980 Post Oak Blvd. Suite 1380	Houston	TX	77056
	Sanford Kuhl Hagan Kugle Parker Kahn LLP			
Northwest Harris County MUD 28	P. O. Box 867	Groesbeck	TX	76642
Northwest Harris County MUD 30	2727 Allen Parkway Suite 1100	Houston	TX	77019
	Smith, Murdaugh, Little & Bonham LLP			
Northwest Harris County MUD 30	1621 Milam St. Floor 3	Houston	TX	77002

Northwest Harris County MUD 36	6363 Woodway Dr. Suite 800	Houston	TX	77057
	Bacon & Wallace LLP			
Northwest Harris County MUD 36	1621 Milam St. Floor 3	Houston	TX	77002
Northampton MUD	6363 Woodway Dr. Suite 800	Houston	TX	77057
	Bacon & Wallace LLP			
Northampton MUD	P. O. Box 80	Tomball	TX	77377
Shasla PUD	10000 Memorial Drive Suite 260	Spring	TX	77379
	Young & Brooks			
Spring West MUD	1300 Post Oak Blvd. Suite 1400	Houston	TX	77056
Spring West MUD	12012 Wickchester Ln., Suite 120	Houston	TX	77079
Harris County Judge Lina Hidalgo	1001 Preston, Suite 911	Houston	TX	77002
Coastal Water Authority	1160 Dairy Ashford St., Suite 500	Houston	TX	77079
Coastal Water Authority	1801 Main Street, Suite 800	Houston	TX	77002
Gulf Coast Authority	910 Bay Area Blvd.	Houston	TX	77058
North Harris County Regional Water Authority	3648 Cypress Creek Parkway, Suite 110	Houston	TX	77068
Port of Houston Authority	111 East Loop N	Houston	TX	77029
San Jacinto River Authority	1577 Dam Site Road	Conroe	TX	77304
Harris Galveston Subsidence District	1660 W Bay Area Blvd.	Friendswood	TX	77546

# PUBLIC UTILITY COMMISSION OF TEXAS



## AFFIDAVIT OF NOTICE TO CURRENT CUSTOMERS DOCKET NO: 53936

STATE OF COLORADO  
COUNTY OF ARAPAHOE

Stonetown Spring Oaks Utilities, LLC has provided individual notice to its current customers:

DATE OF NOTICE

Attachment A as a sample of the Notice and Maps provided  
to all current customers

October 19, 2022

### OATH

I, ROY LAPIDUS, being duly sworn, file this form as  
AUTHORIZED REPRESENTATIVE (indicate relationship to applicant, that is,  
owner, member of partnership, title of officer of corporation, or other authorized representative of  
applicant); that in such capacity, I am qualified and authorized to file and verify such form, am  
personally familiar with the notices given with this application, and have complied with all notice  
requirements in the application and application acceptance letter; and that all such statements made  
and matters set for therein are true and correct.

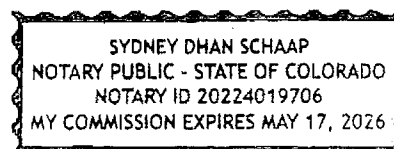
[Signature]  
Applicant's Authorized Representative

If the applicant to this form is any person other than the sole owner, partner, officer of the applicant,  
or its attorney, a properly verified Power of Attorney must be enclosed.

Subscribed and sworn to before me this 19<sup>th</sup> day of October, 2022,  
to certify which witness my hand and seal of office.

[Signature]  
Notary Public in and for the State of Colorado

Sydney Dhan Schaap  
Print or Type Name of Notary Public



Commission Expires May 17<sup>th</sup>, 2026

*Docket No. 53936*

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To:

Date Notice Mailed: October 20, 2022

«RESIDENT»

«MAILING\_ADDRESS»

«CITY\_STATE\_\_ZIP»

<u>Stonetown Spring Oaks Utilities, LLC</u>	<u>211 E. 7<sup>th</sup> St. Suite 620</u>	<u>Austin, TX</u>	<u>78701</u>
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Utility Representative

Stonetown Spring Oaks Utilities, LLC  
Utility Name



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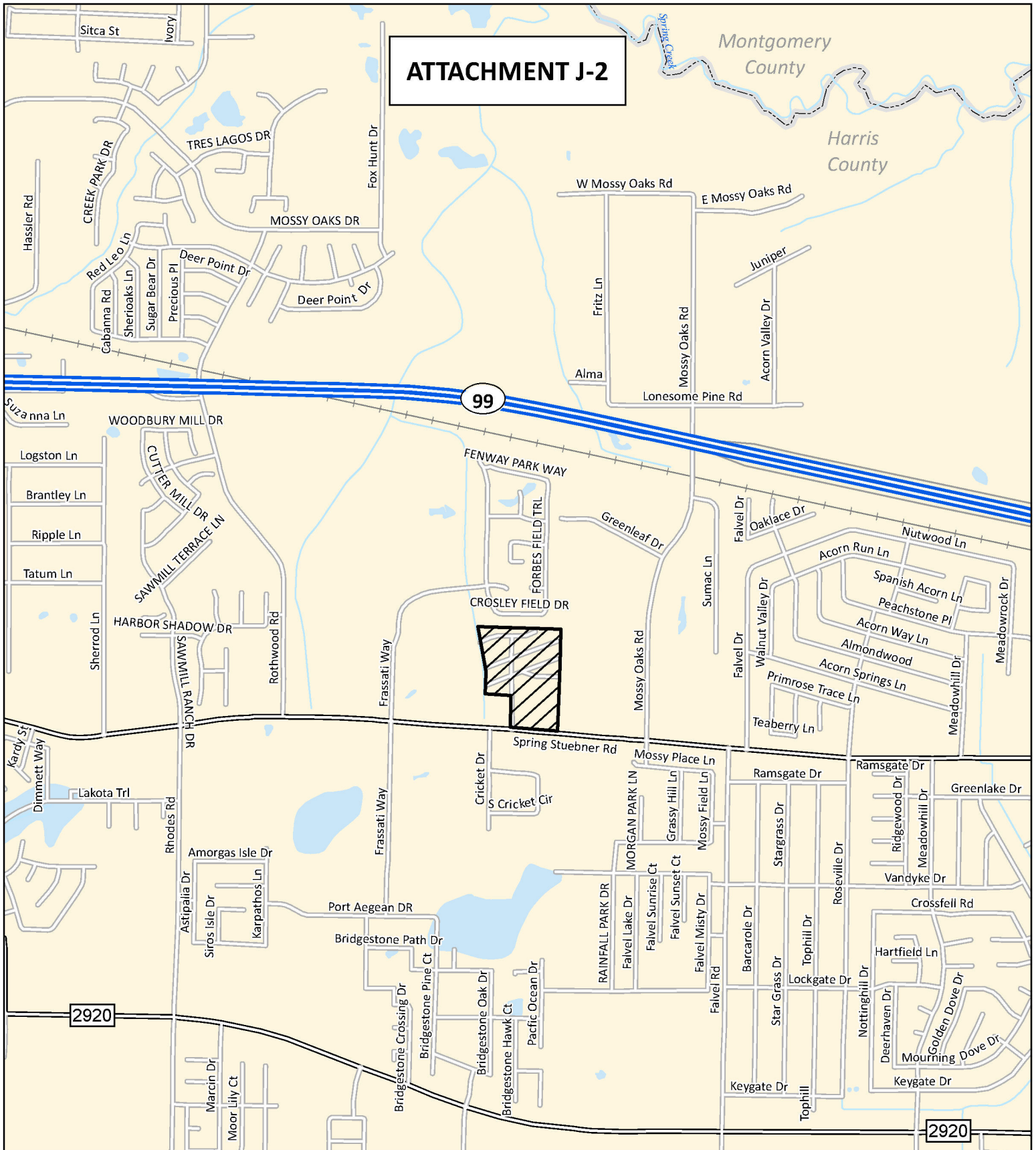
August 30, 2022

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and north of Spring Stuebner Rd.

Harris County, TX



# ATTACHMENT J-2



**Requested Area to Transfer**  
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**New Water and Sewer CCN Numbers**

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