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PUC DOCKET NO. 54546

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APPLICATION OF TEXAS WATER UTILITIES, LP AND WOODLAND OAKS UTILITY LP FOR SALE, TRANSFER, OR MERGER OF FACILITIES AND CERTIFICATE RIGHTS MONTGOMERY COUNTY **PUBLIC UTILITY COMMISSION**

OF TEXAS

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 Texas Water Utility LP's ("TWU") service territory. OPUC's Chief Executive and Public Counsel has determined that residential and small commercial consumers in TWU'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: January 24, 2023

Respectfully submitted,

Courtney K. Hjältman Chief Executive & Public Counsel State Bar No. 24070294

Sharbel A) Sfeir Assistant Public Counsel State Bar No. 24071204 Chris Ekoh Senior Managing Public Counsel State Bar No. 06507015 Justin Swearingen Senior Assistant Public Counsel State Bar No. 24096794 OFFICE OF PUBLIC UTILITY COUNSEL 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) chris.ekoh@opuc.texas.gov (Service) justin.swearingen@opuc.texas.gov (Service) opuc_eservice@opuc.texas.gov (Service)

CERTIFICATE OF SERVICE

PUC DOCKET NO. 54546

I hereby certify that a copy of the foregoing document was served on all parties of record in this proceeding on this 24th day of January 2023 by facsimile, electronic mail, and/or first class, U.S. Mail.

Sharbel A) Sfeir