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PUC DOCKET NO. 54565

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APPLICATION OF CSWR-TEXAS UTILITY OPERATING COMPANY, LLC FOR AUTHORITY TO CHANGE RATES PUBLIC UTILITY COMMISSION

OF TEXAS

MOTION TO INTERVENE OF THE DOMINION HOMEOWNERS ASSOCIATION

The Dominion Homeowners Association ("Dominion") moves to intervene in this docket pursuant to Tex. Water Code § 13.301 and 16 Tex. Admin. Code ("TAC") § 22.103.

I. Background

On February 3, 2023, CSWR-Texas Utility Operating Company, LLC ("CSWR") applied for Public Utility Commission of Texas ("Commission") approval of a rate increase for water and wastewater service for its Texas customers, including those customers who are members of Dominion. According to information provided by CSWR, sewer rates for the Leon Spring wastewater system would increase from \$21.56 per month to \$66.65 per month if the Commission were to grant the requested increase.

II. Motion to Intervene

The names, addresses and telephone numbers of Dominion's authorized representatives in

this proceeding are:

Rob McDaniel, PCAM General Manager The Dominion Homeowners Association 20 Dominion Drive, San Antonio, TX 78257 Phone: (210) 698-1232 Email: generalmanager@dominionhoa.com

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Ron H. Moss Winstead PC 401 Congress Avenue, Suite 2100 Austin, Texas 78701 Phone: (512) 370-2867 Facsimile: (512) 370-2850 Email: rhmoss@winstead.com

All pleadings and other documents should be served upon Dominion's authorized representatives.

16 TAC § 22.103 provides that a person has standing to intervene if that person has or represents persons with a justiciable interest which may be adversely affected by the outcome of the proceeding. Dominion is an association that exists to represent the interests of homeowners in the Dominion subdivision, all of which will be adversely affected by the outcome of this proceeding if CSRW is allowed to raise rates for wastewater service.

For these reasons, Dominion requests that the Commission grant this Motion to Intervene and admit Dominion as an Intervenor for all purposes. Dominion further requests any other relief to which it may be entitled. Respectfully submitted,

WINSTEAD PC

By: /s/ Ron H. Moss

Ron H. Moss State Bar No. 14591025 <u>rhmoss@winstead.com</u> 401 Congress Avenue, Suite 2100 Austin, Texas 78701 Telephone: (512) 370-2800 Facsimile: (512) 370-2850

ATTORNEYS FOR DOMINION HOMEOWNERS ASSOCIATION

CERTIFICATE OF SERVICE

This document was filed on the Commission's Interchange website on February 23, 2023. Dominion will serve this pleading on CSWR-Texas. After the Commission establishes a service list for this docket, Dominion will serve this pleading on other parties if required by Commission order..

/s/ Ron H. Moss

Ron H. Moss