



Control Number: 54565



Item Number: 1838

RATEPAYER COMMENTS/REQUESTS TO INTERVENE **RECEIVED**

If you wish to PROTEST the proposed rate change, you must complete this form and file it electronically using the PUC Interchange Filer (<http://www.puc.texas.gov/industry/filings/E-FilingInstructions.pdf>) or mail the original to:

2023 MAR 9 AM 10:12  
PUBLIC UTILITY COMMISSION  
FILING CLERK

**Filing Clerk**  
**Public Utility Commission of Texas**  
**1701 North Congress Avenue**  
**P.O. Box 13326**  
**Austin, Texas 78711-3326**

No hearing will be held and the rates will be effective as proposed unless protests are received from at least 10% of ratepayers or from any affected municipality, or the Commission Staff requests a hearing.

CUSTOMER INFORMATION (please provide all of the requested information)

First Name: Steven & Debra Last Name: Griffith  
Phone Number: 361-205-1546 or 361-205-5799 Fax Number: \_\_\_\_\_  
Email Address: debbie.griffith@sbcglobal.net steve.griffith1991@gmail.com  
Address, City, State: 107 Bufflehead Ln. Rockport, TX 78382  
Location where service is received: \_\_\_\_\_  
(if different from the mailing address)

Please select the applicable :

**I wish to PROTEST the following proposed rate action/s:**

☒ I wish to be a COMMENTER. I understand that: I am NOT a party to this case; my comments are not considered evidence in this case; and I have no further obligation to participate in the proceeding. Public comments may help inform the PUCT of the public concerns and identify issues to be explored. Please provide comments below. Attach a separate page, if necessary.

☒ I am requesting to INTERVENE in this proceeding. As an INTERVENOR, I understand that: I am a party to the case; I am required to respond to all discovery requests from other parties; I may be required to attend hearings, and if I file testimony, I may be cross-examined in the hearing; if I file any documents in the case, I must provide a copy to every other party in the case; and I acknowledge that I am bound by the Procedural Rules of the PUCT and the State Office of Administrative Hearings (SOAH).

Signature of Ratepayer:

Debra Griffith Steven Griffith Date: 3/1/23

Si desea informacion en Espanol, puede llamar al  
**1-888-782-8477**

Hearing- and speech-impaired individuals with text telephones may contact the PUCT's Customer Assistance Hotline  
at  
**512-936-7136**

18390

**PUC DOCKET NO. 54565**

Filing Clerk  
Public Utility Commission of Texas  
1701 North Congress Avenue  
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Austin, TX 78711-3326

I wish to PROTEST the proposed rate action by CSWR-Texas Utility Operating Company 13290 (Water) & 21120 (Sewer).

There are numerous problems with the proposed rate to be effective 3/10/12. Below are the reasons for the protest that we request be taken into consideration to prevent this action:

1. The Company states they have invested over \$30 million and state a long list of issues, of which the majority are to be performed in the future. The last rate increase listed almost the exact same reasons. If such an investment was required, why did they make such a purchase that required a major and significant investment they could not fund? Residents have NOT seen any benefits from the supposed investments made and needed in the future.
2. The Company is proposing to more than double the current rates. The county communities impacted by this rate change is mostly made up of retirees on a fixed income, 2<sup>nd</sup> homes that may be visited 1-2 times per month, and some rental properties.
3. Not enough information was provided in the Notice of Proposed Rate Change (Page 1) to clearly understand how the change will impact residents. Is the 5,000 gallons used in the example supposed to be prorated if under 5,000? What is the proposed "Pass Through Charges"? There is no explanation and it leads one to anticipate a Pass Through Charge with each invoice. Additionally, there are mathematical inconsistencies reflected as well.
  - a. Existing Rate based on 5,000 gallons at \$41.25 or (\$8.25/1000 gallons/mth). How does this correlate to the \$4.44/1000 gallons stated on page 2?
  - b. Proposed Rate based on 5,000 gallons at \$81.68 or (\$16.34/1000 gallons/mth). How does this correlate to the \$5.53/1000 gallons stated on page 2?
4. The Company has been negligent with their billing and it likely contributes to their need for additional revenue. Their messy accounting should not fall on property owners to rectify. Below are just some of the problems:
  - a. Company representative was unable to validate the charge for the Water Service Base which is supposed to be based on the line size (5/8" to 3"). Since last August, myself and others have had monthly charges ranging from \$15.71 (Jan '23) to \$22.19 (prior to Jan '23). According to the Notice, the "current rates" are higher than what's being billed. If the proposed rates are applied we will see a 62% - 73% INCREASE depending on either of the rates applied since August '22.
  - b. Company representative was unable to explain why we were all paying \$6.40/1000 gallons prior to Jan '23 and in Jan '23 the rate reduced to \$4.40. Was this because that's what they said on their Notice of Rate Change and they've been overcharging us in the past?
  - c. Company representative was unable to tell me what line size I have.
  - d. Company representative stated that the Meter Service Base rate was reflective of the line size and the first 1,000 gallons and that the Gallon Charge was supposed to be on the gallons above the first 1,000. Is this true?
  - e. Company representative stated that the proposed "Water – Pass Through Charges" are going from no cost to \$37.05 based on 5,000 gallons. I was told that we would unlikely see a pass

through charge as it was only in case wholesale water had to be purchased and other more major problems with the ground water. Is this true?

- f. One neighbor who stays in her home once for 2-3 days every 5-6 weeks is showing gallon usage of almost 8,000/month, approximately 3-4 times that of full-time residents. This neighbor has NOT been notified of the proposed rate change.
- g. Another neighbor whose house is vacant except for 4 weekends a year has not had his meter read in many many months and he's paying approximately \$30/month. He too has NOT been notified of the proposed rate change. Neighbors don't report seeing someone check meters like they did in the past under the prior owner.

In summary, this proposed rate change documentation is very messy, isn't understandable, and is exorbitant! Their invoices are inconsistent. Until there is better accounting, record-keeping, management and due diligence it doesn't seem fathomable that rates should change.

Thank you,

Steve and Debbie Griffith

