



Filing Receipt

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PUC DOCKET NO. 54565

RATEPAYER COMMENTS/REQUESTS TO INTERVENE

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_filing/filing_instructions.pdf) or mail the original to:

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: Thomas Last Name: Kirby
Phone Number: 210-908-9913 Fax Number: _____
Email Address: tomkirbyja@yahoo.com
Address, City, State: 9 Walden Elms., San Antonio, TX 78257
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.

see attached sheet

☐ 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: _____

Date: 10 March 2023

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

PUC Docket No. 54565
Ratepayer Comments

10 March 2023

From: Thomas M. Kirby

4 Walden Elms

San Antonio, Texas 78257

To: Public Utility Commission of Texas

As a concerned ratepayer, I wish to PROTEST the rate change proposed by CSWR-Texas Utility Operating Company, LLC.

To this ratepayer, this acquisition and Rate Change Request bears the appearance of a "Bait and Switch" scheme.

In September 2021, when CSWR-Texas sent notice to then-current Leon Springs Utility customers that they intended to acquire the Leon Springs Utility in February 2022, they went to great pains in their notice of intent to purchase (Docket No, 52410) to assure the 1,209 customers that the "...transaction will not have an effect on the current customer's rates and services." CSWR -Texas went on to explain the monthly charges: \$11.93 for the first 1,500 gallons plus \$2.78 for each additional 1,000 gallons, and that the individual gallonage charges would be based upon the average water consumption for the winter period from mid-November to mid-March, which seemed reasonable.


However, my average monthly sewer service charge increased from an average of \$27.46 per month (based on an average 2021-2022 winter month consumption of 12,157 gallons from SAWS bills) before CSWR acquisition, to \$48.23 per month (based on CSWR's reported average consumption of 14,711 gallons for the same winter month period) after CSWR acquisition – a 76% increase. I cannot explain the 2,554 gallon per month discrepancy in favor of CSWR. In fact, in January of this year (2023), my bill for CSWR sewer service (\$48.98) actually exceeded my SAWS water bill (\$39.65).

Now, less than a year after their acquisition, CSWR is now seeking a rate increase to a flat rate of \$66.65, which, in my particular case, represents an additional 38% increase over CSWR current charges, and a 143% increase over the charges a year ago under Leon Springs Utility.

I find it impossible to believe that CSWR-Texas was not aware of their future requirement for the additional revenue of \$4.6 M over the current revenue for infrastructure improvements and operations costs at the time they sent notice intent to acquire Leon Springs Utility in September 2021, assuring future customers that their bills would not be affected. In my opinion CSWR-Texas was disingenuous, if not outright deceptive, by not informing their future customers of their plans (which would have a significant impact on their future sewer service charges), but rather deceived in order to avoid any possible objection to their purchase.

I strongly PROTEST CSWR-Texas' proposed rate increase.

Respectfully,



Thomas M. Kirby