



Control Number: 54565



Item Number: 2092

RATEPAYER COMMENTS/REQUESTS TO INTERVENE AND COMMENT: 44

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:

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) **BARNETT COVE**

First Name: DOUG Last Name: POTTS

Phone Number: 979-308-9883 Fax Number: _____

Email Address: DOUG.POTTS@YAHOO.COM

Address, City, State: 3343 LCR 750, TITONTON, TX 76687

Location where service is received: BARNETT COVE RESIDENTS
(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: _____

Date: 3-13-23

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

2092

Request to Intervene on Proposed Rate Increase by CSWR-Texas Utility Operating Company, LLC

PUC Docket # 54565

Filing Clerk

Public Utility Commission of Texas

1701 North Congress Avenue

PO Box 13326

Austin, Texas 78711-3326

To Whom it may concern,

I object to the proposed rate increase of approximately 155% by CSWR-Texas Utility Operating Company, LLC and request to be granted **intervenor** status on behalf of customers of the legacy Lake Limestone Coves Water System. This rate increase is grossly excessive and predatory in nature. CSWR recently completed the purchase of our legacy water supply company, Lake Limestone Coves Water System, Inc (Docket #53456) in September 2022. In their initial Notice to Customers concerning this purchase dated 5/19/2022, their letter states that the purchase includes 424 customers and that "This transaction **will not** have an effect on the current customer's rates and services". This statement allayed impacted customers fears resulting in few objections to the purchase, and little if any protests were filed with PUC. After the purchase was approved by PUC and finalized, a welcome letter was sent by CSWR on 9/21/22 announcing the completion of the sale and it also states "Your current rate for water will remain unchanged at this time". We recently received a Notice of Proposed Rate Change dated 2/3/2023 that would have the minimum monthly rate increase by 137% and the more typical household monthly bill increase by approximately 155% (see table below).

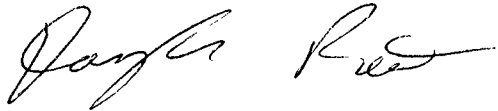
	Gallons Used		
	0	5000	10000
CSWR (Previous Rates)	\$ 22.75	\$ 31.75	\$ 43.00
CSWR (New Rates)	\$ 54.03	\$ 81.68	\$ 109.33
% Increase	137.5%	157.3%	154.3%

CSWR has not acted in good faith and their acquisition of small water supply systems in Texas is predatory in nature. In our case, 424 customers make up the legacy Lake Limestone Coves Water System which was operated profitably for at least the last 10 years at the previous rate structure. CSWR purchased the system and lumped it and us 424 customers into an "umbrella" water supply company that entails approximately 74 different water supply systems and 8350 customers.

CSWR is seeking an increase of ~\$3.5 million over current revenue, the proposed rate increase for our system would generate \$286,417 of that revenue. The 424 customers on this water system account for only ~5% of the total CSWR customers, however this rate increase would burden us with >8% of the

overall \$3.5 million revenue increase. While to date, outside of normal maintenance, there have been no improvements or investments in the water system providing service to us 424 customers.

I am requesting the PUC grant me intervenor status and to hold a public hearing and subsequently reject this excessive rate increase. I would also request that the PUC investigate the business practices and actions of CSWR for predatory behavior and take any actions available to protect the citizens of Texas from further damage.

A handwritten signature in black ink, appearing to read "Douglas Potts". The signature is fluid and cursive, with the first name "Douglas" written in a larger, more prominent script than the last name "Potts".

Douglas Potts

3343 LCR 750

Thornton, TX 76687

979-308-9883