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PUC DOCKET NO. 54617

APPLICATION OF TEXAS WATER UTILITIES, LP AND SOUTHERN HORIZONS DEVELOPMENT, INC. FOR SALE, TRANSFER, OR MERGER OF FACILITIES AND CERTIFICATE RIGHTS IN LIBERTY AND MONTGOMERY COUNTIES	§ § § § § § §	PUBLIC UTILITY COMMISSION OF TEXAS
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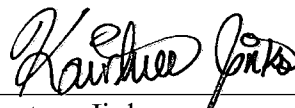
**OFFICE OF PUBLIC UTILITY COUNSEL'S
MOTION TO INTERVENE**

Pursuant to Texas Utilities Code §§ 13.001 and 13.003(a)(3)(A)-(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 the residential and small commercial consumers in Texas Water Utilities, LP and Southern Horizons Development, Inc. (“Applicants”) service territory. OPUC’s Chief Executive and Public Counsel has determined that residential and small commercial consumers in the Applicants’ 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: March 16, 2023

Respectfully submitted,

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**ATTORNEYS FOR THE
OFFICE OF PUBLIC UTILITY COUNSEL**

CERTIFICATE OF SERVICE

PUC DOCKET NO. 54617

I hereby certify that a copy of the foregoing document was served on all parties of record in this proceeding on this 16th day of March 2023, by facsimile, electronic mail, and/or first class, U.S. Mail.



Kourtnee Jinks