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Subject: Intervenor Reply to Initial Brief

TO WHOM IT MAY CONCERN

I. INTRODUCTION

On July 23, 2024, the administrative law judge (ALJ) ordered to submit all Reply to Initial Brief by August 23, 2024. Therefore, this reply to initial brief is timely filed.

II. ISSUES WITH TWU AND PUC INITIAL BRIEF

Public Interest. Higher rates are never in the public interest no matter how you try to spin it. The entitlement attitude is very worrisome. Quoting water rate change dockets like Docket No. 50944 and Docket No. 54565, where PUC sided with the water utilities, and hundreds of intervenors concerns were disregarded, provides them with their entitlement attitude.

Just and Reasonable. Under the law, consolidation of rates should be by regions unless TWU thinks Texas is a region. 2nd largest in Texas with SWWC, its affiliate, being in numerous other southern states. Intervenors don't stand a chance as mentioned in TWU Initial Brief, by Mr. Faulk, "customers without any water ratemaking experience should not be given any weight in this proceeding." Disheartening.

Cost. Water is provided by GOD. We are on well water, not pass-through or purchased water. If SHDI can pump-distribute-maintain-steward (cost of operation) over all its wells for the current price "what makes TWU so special". Placing the burden of high prices (100% increase) on the customers is stressing all of us and not good for our economy. Paying for what? Other subdivisions, estates, utilities, staff, etc. where is the money going. That burden should never be placed on us what is serviced by SHDI. During a rate change application, the burden of proof for expenses is on the utility and the process is substantially harder to justify the rates the utility plans to impose. Letting TWU automatically impose their higher rates in an STM will give them the precedents for all future STM cases. For the PUCs failure to stop such power grab during a STM or rate case is mindboggling. Laws are to protect the consumers and also be just to the utility. I do not see the just and reasonable and public interest being on the consumer site only on the utilities. Consolidation is against free market and lets large utilities get away with anything. The economy in every region has to be taken in consideration not just one price for all. No input from consumers and the hardship they are going through and will go through just because of a STM. This is a monopoly.

Procedure. For us intervenors, without legal knowledge, this process is grueling, intimidating, frustrating you name it. The consistent threat to be eliminated is very real. As TWU Mr. Faulk so clearly stated in his fillings, SHDI is small compared to others (I see that as "why bother"). That we should not have any weight in this proceeding is not just. His statement on less than 10% intervenors, which are required for a rate change case for a class A utility (I have yet to find that in a STM law). The disregard of hundreds of intervenors on the dockets mentioned above. Why have intervenors? PUC consistent recommendation that this STM is in the public interest is breathtaking. This is up to the Commission. The Commission MAY consider and we can only pray, that in our case, PUC and OPUC will represent the consumer and be just and reasonable for public interest.

III. CONCLUSION

For the reasons detailed above, my position remains that TWU should not be allowed to force their exorbitant initial rates onto the Southern Crossing, Southern Oak, and Southern Forest consumers. I respectfully request that we, the consumers, can remain with our existing rates.

Respectfully submitted,

Anna Miller

Intervenor