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**SOAH DOCKET NO. 473-24-13127
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	§ § § § § § §	BEFORE THE STATE OFFICE OF ADMINISTRATIVE HEARINGS
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**OFFICE OF PUBLIC UTILITY COUNSEL’S
PROPOSED FINDINGS OF FACT, CONCLUSIONS OF LAW,
AND ORDERING PARAGRAPHS**

TO THE HONORABLE ADMINISTRATIVE LAW JUDGES:

Pursuant to your request, the Office of Public Utility Counsel (“OPUC”), representing the interests of residential and small commercial consumers in Texas, respectfully offers the following Findings of Fact, Conclusions of Law, and Ordering Paragraphs for your consideration. These proposed findings and conclusions are not exhaustive, but each one presented below should be included in the Proposal for Decision’s findings of fact, conclusions of law, and ordering paragraphs:

PROPOSED CONCLUSIONS OF LAW

1. TWC § 13.301 requires the Commission to determine whether a transaction will be in the public interest when reviewing a sale, transfer, or merger application.¹

2. The Commission has authority to consider that a transaction is in the public interest if it will lower costs to consumers

¹ TWC § 13.301(c)(5).

3. Applying TWU's initial rates will increase rates to consumers of Southern Horizon.
4. Pursuant to 16 TAC § 24.240(c)(1) the Commission may authorize the use of different initial rates than the existing rates proposed by the applicant.
5. Pursuant to 16 TAC § 24.240 the Commission may choose any phased in rate in a multi-year tariff regardless of a rate being the rate in effect at the time the order is signed.

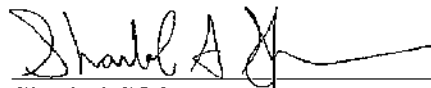
PROPOSED ORDERING PARAGRAPHS

1. To mitigate unavoidable rate shock, TWU shall apply to customers of Southern Horizons the tariff phased-in rates for the Villas of Willowbrook Rates (Phase 4 of 7) as proposed in Staff witness Mr. James Harville's direct testimony.

Date: August 23, 2024

Respectfully submitted,

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CERTIFICATE OF SERVICE
SOAH DOCKET NO. 473-24-13127
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 23rd day of August 2024 by facsimile, electronic mail, and/or first class, U.S. Mail.



Sharbel A. Sfeir