



Filing Receipt

Filing Date - 2024-11-22 02:48:37 PM

Control Number - 54617

Item Number - 145

Public Utility Commission of Texas

Docket No. 54617

SOAH Docket No. 473-24-13127

Central Records

22 November 2024

P.O. Box 13326

Austin, TX 78711-3326

Subject: Intervenor Reply to TWU Exceptions to Proposal for Decision

TO WHOM IT MAY CONCERN

I. REPLY TO TWU EXCEPTIONS TO PROPOSAL FOR DECISION

TWU's twisting and turning of the Texas Water Code to fit their goal and claim of entitlement is astonishing. Public Utility Commission of Texas main mission and function is to protect the "Public" and rule just and reasonable with in the interest of the public. Thinking otherwise is in error.

TWC 13.3011 clearly states "may request". It does not give an automatic approval. Even if TWC 24-240 will not be used (as requested by TWU) the mission and function of PUC does not change. PUC may approve or disapprove.

TWU's justification and admitting to "other customers would effectively be subsidizing Southern Horizon Development Inc. (SHDI) customers" shows that our revenue will be used for other TWU's customers and not just for SHDI systems. Where will the increase of rate be used and when is it enough. If there is a rate increase (capital improvement as stated) it should only be used for our systems not some other systems. To many questions in this STM.

SHDI currently is a Class D utility. TWC 13.1872 Class D Utilities: Rate Adjustment authorizes SHDI to increase its rates by 5% not more

than once each year and not more than four times between rate proceedings (total of 20%). Docket 51017, dated 24 Oct 2020, reflects this clearly. SHDI did not follow-up on the additional three more times of 5% as authorized. SHDI clearly was authorized. Furthermore, SHDI built a new well in 2020 which was finished in 2021. This leaves a question to what lack of revenue. SHDI also decided to keep staff and contractors at minimum and still meeting all TCEQ requirements. This leaves to question what TWU's excessive rates (capital improvement charges) are for.

This excessive rate would have to be justified under a Rate Case but not under a STM. Class D compared to Class A Rate Cases are different. It will be very hard for all of TWUs customers to fight such rate case. Having to come up with 10% intervenors (in the thousands) is hard to accomplish. Docket 56665, currently on going, is the goal of TWU. This would even but more burden and hardship on us the public. Going from 2000 gallons SHDI \$32.20 to requested TWU (under this docket) \$61.33 to Docket 56665 \$77.53 is beyond all comprehension. No end in side. Monopoly and corporate greed. Just and reasonable, public interest?

What is TWU's reason for not compromising? This STM could have been finished last year with SHDI existing rates.

II. CONCLUSION

For the reasons discussed herein, my position remains that TWU should not be allowed to make all the exceptions so they can force their exorbitant initial rates onto the Southern Crossing, Southern Oak, and Southern Forest consumers. I respectfully request that we, the consumers, be heard in this matter.

Respectfully submitted,

Anna Miller

Intervenor