



## **Filing Receipt**

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**Item Number - 11**

**DOCKET NO. 55020**

<b>PETITION OF NMCV TAYLOR</b>	<b>§</b>	<b>BEFORE THE</b>
<b>PROPERTY INVESTORS, LLC TO</b>	<b>§</b>	
<b>AMEND MANVILLE WATER SUPPLY</b>	<b>§</b>	
<b>CORPORATION WATER CCN NO.</b>	<b>§</b>	<b>PUBLIC UTILITY COMMISSION</b>
<b>11144 IN WILLIAMSON COUNTY BY</b>	<b>§</b>	
<b>STREAMLINED EXPEDITED</b>	<b>§</b>	<b>OF TEXAS</b>
<b>RELEASE</b>	<b>§</b>	

**NMCV TAYLOR PROPERTY INVESTORS, LLC’S RESPONSE TO ORDER NO. 4**

COMES NOW, NMCV Taylor Property Investors, LLC (“NMCV” or “Petitioner”) and responds to Order No. 4 Rescinding Finding that Petition, as supplemented, is Administratively Complete and Finding that Notice is Sufficient, and Establishing Procedural Schedule, and in support thereof, would respectfully show the following:

**I. BACKGROUND**

Petitioner filed its petition to amend the water certificate of convenience and necessity (“CCN”) No. 11144 of Manville Water Supply Corporation (“Manville”) by streamlined expedited release on May 18, 2023 (hereinafter, “SER Petition”). Subsequently, Petitioners supplemented the Petition mapping on May 31, 2023. The Administrative Law Judge (“ALJ”) of the Public Utility Commission of Texas (“Commission”) declared the supplemented SER Petition administratively complete on June 21, 2023. However, the Commission ALJ rescinded her finding of administrative completeness in Order No. 4 issued on August 3, 2023 and established a deadline of August 10, 2023 to provide proof of proper notice. Therefore this pleading is timely filed.

**II. NOTICE WAS ACCURATE AND EFFECTIVE**

Order No. 4 states that the petitioner has not demonstrated that the Petition was mailed to the current CCN holder at the correct address.<sup>1</sup> Petitioner mailed a copy of the Petition with complete exhibits to Manville’s General Manager Tony Graf at the physical address of the water supply corporation – 13805 South SH 95, Coupland, Texas 78615 – by certified mail on May 18,

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<sup>1</sup> Order No. 4 at 2 (Aug. 3, 2023).

2023. A copy of the date stamp and receipt from the U.S. Postal Service is attached hereto as Exhibit A. Petitioner obtained the contact and address information from Manville's website on May 18, 2023, the same day it filed and mailed the Petition. This information is still provided on Manville's website at the time of this filing as reflected in attached Exhibit B. Exhibit B shows that Manville's General Manager, for purposes of contact, is still Tony Graf and there are two addresses listed. Petitioner is not aware of whether Manville's website listed both its physical address and P.O. Box on May 18, 2023 or whether the P.O. Box was added subsequent to Petitioner's filing. However, Exhibit A, which also contains the certified mail return receipt or "green card," demonstrates that notice was in fact effectuated and Manville received a copy of the Petition on May 24, 2023.

Title 16 Tex. Admin. Code ("TAC") § 24.245(h)(3)(F) requires a landowner seeking streamlined expedited release to provide proof that a copy of the petition was mailed to the current CCN holder via certified mail.<sup>2</sup> The Exhibit A "green card" constitutes proof that the copy of the petition was not only mailed via certified mail but also received by the CCN holder. The "green card" also demonstrates that the Petition was mailed to and received at the correct address, Manville's place of business. Further, Petitioner's use of the physical address (instead of P.O. Box) was not in error. Manville simply maintains two addresses on its website currently and neither address incorrect, especially in light of the fact that the Petition was received by Manville. The purpose of the Commission's SER mailing provision is to make sure an affected CCN holder is given due notice of the proposed release before it occurs. That has occurred in this case and Petitioner's 486.392 acres should be released.

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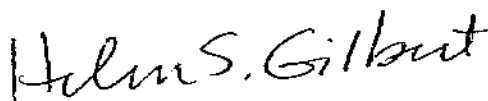
<sup>2</sup> 16 TAC § 24.245(h)(3)(F).

### **III. CONCLUSION**

WHEREFORE, PREMISES CONSIDERED, Petitioner NMCV Taylor Property Investors, LLC respectfully prays that the Commission ALJ find the Petition administratively complete and grant the release of its approximately 486.392-acre tract from Manville Water Supply Corporation's water CCN No. 11144 in Williamson County, and to all other such relief to which it is entitled.

Respectfully submitted,


Helen S. Gilbert  
State Bar No. 00786263  
BARTON BENSON JONES PLLC  
7000 N. MoPac Expwy, Suite 200  
Austin, Texas 78731  
Telephone: (210) 640-9174  
Telecopier: (210) 600-9796

By:   
\_\_\_\_\_  
Helen S. Gilbert

**ATTORNEY FOR NMCV TAYLOR  
PROPERTY INVESTORS, LLC**

### **CERTIFICATE OF SERVICE**

I hereby certify that I have or will serve a true and correct copy of the foregoing document via hand delivery, facsimile, electronic mail, overnight mail, U.S. mail, or Certified Mail Return Receipt Requested on all parties on the 9th of August 2023.

  
\_\_\_\_\_  
Helen S. Gilbert

# EXHIBIT A



WEST AUSTIN  
2418 SPRING LN  
AUSTIN, TX 78703-9998  
(800)275-8777

05/18/2023

01:51 PM

Product	Qty	Unit Price	Price
First-Class Mail® Large Envelope	1		\$1.98

Coupland, TX 78615  
Weight: 0 lb 3.60 oz  
Estimated Delivery Date  
Sat 05/20/2023  
Certified Mail® \$4.15  
Tracking #:

7020064000126944528  
Return Receipt \$3.35  
Tracking #:

9590 9402 7287 2028 8600 59  
Total \$9.48

Grand Total \$9.48

Credit Card Remit  
Card Name: VISA  
Account #: XXXXXXXXXX0424  
Approval #: 01588G  
Transaction #: 327  
AID: A0000000031010  
AL: VISA CREDIT  
PIN: Not Required  
Chip  
CHASE VISA

## U.S. Postal Service™ CERTIFIED MAIL® RECEIPT Domestic Mail Only

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Extra Services & Fees (check box, add fee as appropriate)  
☐ Return Receipt (hardcopy)  
☐ Return Receipt (electronic)  
☐ Certified Mail Restricted Delivery  
☐ Adult Signature Required  
☐ Adult Signature Restricted Delivery  
Postage  
Total Postage and Fees

Stamp To: Tony Graf - Manville WSC  
Serial and Post No. or PO Box No. 13805 South SH 95  
City, State, ZIP+4® Coupland, TX 78615

PS Form 3811, April 2016 PSN 7530-02-000-9053 See Reverse for Instructions

### SENDER: COMPLETE THIS SECTION

- Complete Items 1, 2, and 3.
- Print your name and address on the reverse so that we can return the card to you.
- Attach this card to the back of the mailpiece, or on the front if space permits.

1. Article Addressed to:

Tony Graf  
Manville Water Supply Corp  
13805 South SH 95  
Coupland, TX 78615



9590 9402 7287 2028 8600 59

2. Article Number (Transfer from service label)

7020 0640 0001 2694 4528

PS Form 3811, July 2020 PSN 7530-02-000-9053

### COMPLETE THIS SECTION ON DELIVERY

- A. Signature  
☒ Agent  
☐ Addressee  
B. Received by (Printed Name)  
C. Date of Delivery  
D. Is delivery address different from Item 1?  
If YES, enter delivery address below:

3. Service Type  
☐ Adult Signature  
☐ Adult Signature Restricted Delivery  
☐ Certified Mail®  
☐ Certified Mail Restricted Delivery  
☐ Collect on Delivery  
☐ Collect on Delivery Restricted Delivery  
☐ Priority Mail Express®  
☐ Registered Mail™  
☐ Registered Mail Restricted Delivery  
☐ Signature Confirmation™  
☐ Signature Confirmation Restricted Delivery

Domestic Return Receipt





Committed to Providing Clean, Safe Water for All Our Residents

512-856-2488  
Office hours 8:30am - 3:30pm  
24/7 Emergency 512-856-2488  
Mailing address:  
PO Box 248 Coupland, TX 78615  
**Contact Us**

- Home
- Customer Service ▾
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## Meet the Staff

Our courteous and knowledgeable staff is here to serve YOU...our customer. They have combined work experience in the water industry of 150+ years.

- Tony Graf - General Manager

(512) 856-2488 ext 223

Email: [tonygraf@manvillewsc.org](mailto:tonygraf@manvillewsc.org)
- Rexanne Pilkenton - Assistant General Manager

Email: [rexannep@manvillewsc.org](mailto:rexannep@manvillewsc.org)
- Jennifer Tatrow - HR- Payroll Coordinator/ Finance Assistant

June Shirocky - Accounts Payable Specialist

Sharon Kreidel - Finance Specialist

Janeann Bland - Executive Assistant

Sue Johnston - Administrative Assistant

Helen Medina - Accounting Clerk
- Donna Hall - Accounts Receivable/C.S.R. Supervisor

Laura Fenske - C.S.R. Senior - Billing

Leslie Johnson - C.S.R.- New Accounts

Susan Carrizales - C.S.R.

Linda Benitez - C.S.R.

Maci Guerrero - C.S.R.
- Erik Prinz - Assistant General Manager

Email: [eprinz@manvillewsc.org](mailto:eprinz@manvillewsc.org)
- Raul Ochoa - Construction Coordinator

Brandon Young - Construction Technician

Jaycen Yanez - Utility Locator Technician

Alex Chairez - Utility Locator Technician
- Marcus Stifflemire - Production Supervisor

Calvin Blackman - Plant Operator

Ryan Helgren - Senior Production Operator

Logan Lee - Production Operator

Daniel Ochoa- Production Technician

Hayden Ramsey - Production Technician
- Edgar Prinz Jr. - Director of Field Services
- Dennis Gibson - Maintenance & Inventory Specialist
- Richard Brown - Field Supervisor

Matthew Clifford - Senior Water Operator

John Hardin - Water Operator

Tynan Pierce - Utility Equipment Operator

Baldemar Ortiz - Water Maintenance Technician

Lee Ortiz - Water Maintenance Technician

Garrett Harmon - Water Technician

Jose Contretras - Water Technician

### How to Apply for Employment:

Mail [application](#) and **resume** with cover letter to:

Manville Water Supply Corporation  
Search Committee  
P. O. Box 248  
Coupland, Texas 78615

MWSC is an equal opportunity provider and employer.

### BILL PAYMENT

Drought Contingency

Water Quality Report (CCR)

APPLY FOR SERVICE

### Local Weather

Today	Tomorrow	Thursday
Few clouds 104°/78°	Few clouds 104°/79°	Few clouds 104°/79°

## Alerts

### Employment Opportunities

August 06, 2023

### Reminder Stage 3 Watering Restrictions

July 27, 2023

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## Recent News

- 📄 NOTICE TO DEVELOPERS:
  - 📄 Manville 36" transmission line project - easement acquisitions
  - 📄 Manville Stage 3 - Water Restrictions in effect
  - 📄 Extreme Drought Conditions - Water Restrictions
  - 📄 Mandatory Watering Restrictions
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- ★ Texas Rural Water Association
- ★ Water Conservation Tips
- ★ Environmental Protection Agency

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## Manville Water Supply Corporation

13805 South SH 95  
Coupland, TX 78615  
512-856-2488  
Office hours 8:30am - 3:30pm  
24/7 Emergency 512-856-2488 Mailing address:  
PO Box 248 Coupland, TX 78615  
[View Map](#)

Send Us a Message





Committed to Providing Clean, Safe Water for All Our Residents

512-856-2488  
Office hours 8:30am - 3:30pm  
24/7 Emergency 512-856-2488  
Mailing address:  
PO Box 248 Coupland, TX 78615  
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## Contact Us

At Manville Water Supply Corporation, our commitment is to provide the community with superior service. Please feel free to send us an email using the contact form below or give us a call. As your water provider, we welcome your feedback and appreciate your business.

Our friendly staff is available by phone from 8:30 am to 3:30 pm Monday through Friday. However, emergency water leaks or service outages may be reported 24 hours a day, seven days a week.

[Water problems? Here's what to do 1st!](#)

Check your meter leak indicator & check your water softener!

**Lobby Hours - 8:30am - 3:30pm Monday - Friday**

**Phone - 8:30am - 3:30pm Monday - Friday**

### Contact Information:

Office: Local (512) 856-2488

Fax: Local (512) 856-2029

**Lobby Address: 13805 South SH 95 Coupland, TX 78615**

**Mailing Address: P.O. Box 248, Coupland, TX 78615**

**Service Outages/Leaks: (512) 856-2488**  
**24 hours a day, 7 days a week**

MWSC is an equal opportunity provider and employer.

Department to Contact\*

Choose Department

Name\*

Email Address\*

Phone

Account Number

Service Address\*

Subject\*

Message\*

☐

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Submit

E-mail correspondence is maintained in accordance with applicable provisions of State law and may be considered public records. Public disclosure of your communication may be required.

### BILL PAYMENT

[Drought Contingency](#)

[Water Quality Report \(CCR\)](#)

[APPLY FOR SERVICE](#)

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