



## **Filing Receipt**

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**Item Number - 12**

**DOCKET NO. 55414**

**APPLICATION OF CSWR-TEXAS § PUBLIC UTILITY COMMISSION**  
**UTILITY OPERATING COMPANY, §**  
**LLC AND VINEYARD RIDGE WATER § OF TEXAS**  
**SUPPLY, LLC FOR SALE, TRANSFER §**  
**OR MERGER OF FACILITIES AND §**  
**CERTIFICATE RIGHTS IN GILLESPIE §**  
**COUNTY §**

**KIM AND ANTHONY SARAO'S  
MOTION TO INTERVENE**

**COMES NOW** Kim and Anthony Sarao (the "Saraos") and file this Motion to Intervene and would respectfully show as follows:

**I. INTRODUCTION**

On August 29, 2023, CSWR-Texas Utility Operating Company, LLC and Vineyard Ridge Water Supply, LLC filed an application for approval of a sale, transfer, or merger of facilities and transfer of certificate rights in Gillespie County. The Saraos are current ratepayers of the seller, Vineyard Ridge Water Supply, LLC. As set forth below, the Saraos have a justiciable interest that may be adversely affected by the outcome of this proceeding.

**II. AUTHORIZED REPRESENTATIVES**

The Saraos' authorized representatives for service of all pleadings and other documents in this docket and legal representative are:

Joe Freeland  
**Mathews & Freeland, LLP**  
8140 N. Mopac Expy, Suite 4-240  
Austin, Texas 78759  
Telephone: (512) 404-7800  
Facsimile: (512) 703-2785  
Email: [jfreeland@mandf.com](mailto:jfreeland@mandf.com) (Email for Service)

All pleadings, motions and other documents in this proceeding should be served on the Saraos authorized representatives.

### III. JUSTICIABLE INTEREST

The Saraos are ratepayers of the selling utility, Vineyard Ridge Water Supply, LLC. Their water utility services and rates could be affected by the outcome of this matter. The Saraos, therefore, have a clear justiciable interest that may be adversely affected by the outcome of this proceeding.

### IV. PROTECTIVE ORDER CERTIFICATIONS

Attached are protective order certifications of C. Joe Freeland and Kim Sarao. The Saraos request that copies of protected materials be provided to Mr. Freeland pursuant to the protective order in this matter.

### V. PRAYER

WHEREFORE, PREMISES CONSIDERED, Kim and Anthony Sarao respectfully request that this motion to intervene be granted, that they be granted party status, and that they receive any and all relief to which it shows that it is justly entitled.

**Filed: October 18, 2023**

Respectfully submitted,



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C. Joe Freeland  
State Bar No. 07417500  
**Mathews & Freeland, LLP**  
8140 N. MoPac Expy, Ste 4-240  
Austin, Texas 78759  
Telephone (512) 404-7800  
Facsimile (512) 703-2785  
jfreeland@mandf.com

ATTORNEYS FOR KIM SARAO

### CERTIFICATE OF SERVICE

I certify that, unless otherwise ordered by the presiding officer, notice of the filing of this document was provided to all parties of record via electronic mail on October 18, 2023, in accordance with the Orders Suspending Rules filed in Project No. 50664.




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C. Joe Freeland

## ATTACHMENT A

### Protective Order Certification

I certify my understanding that the Protected Materials are provided to me pursuant to the terms and restrictions of the Protective Order in this docket and that I have received a copy of it and have read the Protective Order and agree to be bound by it. I understand that the contents of the Protected Materials, any notes, memoranda, or any other form of information regarding or derived from the Protected Materials must not be disclosed to anyone other than in accordance with the Protective Order and unless I am an employee of the Commission or OPC will be used only for the purpose of the proceeding in Docket No. 55414. I acknowledge that the obligations imposed by this certification are pursuant to such Protective Order. Provided, however, if the information contained in the Protected Materials is obtained from independent public sources, the understanding stated here will not apply.

  
\_\_\_\_\_  
Signature

  
\_\_\_\_\_  
Party Represented

  
\_\_\_\_\_  
Printed Name

  
\_\_\_\_\_  
Date

I certify that I am eligible to have access to Highly Sensitive Protected Material under the terms of the Protective Order in this docket.

  
\_\_\_\_\_  
Signature

  
\_\_\_\_\_  
Party Represented

  
\_\_\_\_\_  
Printed Name

  
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Kim M. Sarao  
Signature

Kim M. Sarao  
Party Represented

Kim M. Sarao  
Printed Name

10/18/2023  
Date

I certify that I am eligible to have access to Highly Sensitive Protected Material under the terms of the Protective Order in this docket.

\_\_\_\_\_  
Signature

\_\_\_\_\_  
Party Represented

\_\_\_\_\_  
Printed Name

\_\_\_\_\_  
Date