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

**CSWR-TEXAS UTILITY OPERATING COMPANY, LLC’S
RESPONSE TO MOTION TO INTERVENE**

CSWR-Texas Utility Operating Company, LLC (“CSWR-Texas”) files this response to Kim and Anthony Sarao’s (“Saraos”) Motion to Intervene, filed on October 18, 2023. Pursuant to 16 Texas Admin. Code § 22.78, this response is timely filed.

I. RESPONSE TO MOTION TO INTERVENE

The Saraos are customers of Vineyard Ridge Water Supply, LLC (“Vineyard Ridge”) and as such have a right to intervene in this proceeding under 16 Tex. Admin. Code § 22.103 as individuals who would be impacted by the sale, transfer, or merger of Vineyard Ridge to CSWR-Texas. In their motion to intervene, the Saraos’ state that they have a clear justiciable interest that may be adversely affected by the outcome of this proceeding as customers of Vineyard Ridge. However, it is the Company’s understanding that the purpose of the intervention is to ensure a pending settlement in another proceeding is not affected by the outcome in this docket.

CSWR-Texas does not oppose the Saraos’ request to intervene on the basis that they are customers of Vineyard Ridge. However, that intervention right is limited by the Commission’s jurisdiction in this case, which is limited to determining whether CSWR-Texas has the financial, managerial and technical capacity to provide continuous and adequate service.¹ Therefore, the Saraos’ intervention should be limited to the scope of this proceeding as enumerated in the Texas

¹ Texas Water Code §§ 13.251 and 13.301; 16 Tex. Admin. Code §§ 24.239(c) and 24.239(h).

Water Code and Commission rules and any request to participate in the proceeding outside the scope of the STM evaluation should be denied.

II. CONCLUSION

For these reasons, CSWR-Texas respectfully requests that the Saraos' intervention be limited to the applicable issues contained in the Texas Water Code and Commission rules and for such other relief to which it has shown itself justly entitled.

Respectfully submitted,

ATTORNEYS FOR CSWR-TEXAS UTILITY OPERATING COMPANY, LLC

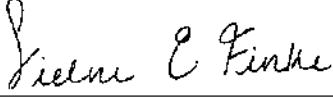
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CERTIFICATE OF SERVICE

I hereby certify that on this 25th day of October 2023, a true and correct copy of the foregoing document was served on all parties of record via electronic mail in accordance with the Order Suspending Rules issued in Project No. 50664.



Sidne E. Finke