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DOCKET NO. 56589

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| PETITION BY RESIDENTS OF GRAND | § | BEFORE THE |
| LAKES MUNICIPAL UTILITY DISTRICT | § | |
| NO. 2 APPEALING THE WATER RATES | § | PUBLIC UTILITY COMMISSION |
| ESTABLISHED BY THE DISTRICT'S | § | |
| BOARD OF DIRECTORS | § | OF TEXAS |

REQUEST TO THE COMMISSION'S LEGAL DIVISION TO INTERVENE

Legal Division

- Ms. Marisa Lopez Wagley, Division Director
- Mr. John York Harrison, Senior Managing Attorney

(1) Reference is made to Order No. 3 [56589-20], our pleading (Motion for Reconsideration) [56589-23], Order No. 4 [56589-31], our appeal [56589-32], and the Motion to Stay [56589-33]. The Administrative Law Judge (ALJ) rushed to decline our pleading (Motion for Reconsideration) [56589-23], while excluding the Commission Staff and the counterparty.

(2) Being unfairly prejudiced by the ALJ's arbitrary interpretation of 16 Texas Administrative Code (TAC) § 22.101(a), residents request the prompt intervention of the Commission's Legal Division and expect a prompt resolution of the matter. The issue complained of is one of principle and benefits the general public. The law must be applied properly and interpreted correctly. Justice and the rule of law become meaningless if challenging an error or oversight is met with defiance, arbitrariness, or retaliation. We are afraid that this incident will create an unhealthy atmosphere that harms the proceedings.

(3) Our interpretation of TAC § 22.101(a) is in paragraph (2).(g) of the Motion for Reconsideration [56589-23] and paragraph (6) of the appeal [56589-32]. Residents insist on this interpretation because of the provision's use of two different terms; 'person' and 'party'. The Grand Lakes ratepayers are a 'party', not a 'person'. And the Lead Petitioner (Petitioner of Record) in the instant case represents a 'party' (Grand Lakes ratepayers), not a 'person'. All other paragraphs in both submissions also argue against the ALJ's arbitrary and unlawful demand and the ALJ's utterly flawed interpretation of TAC § 22.101(a).

Katy, Texas on the 23rd day of May 2024.

Respectfully submitted,

on behalf of Grand Lakes MUD No. 2 ratepayers

George J. Wakileh, Ph.D.
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CERTIFICATE OF SERVICE

I, George J. Wakileh, certify that notice of the filing of this pleading is being provided to all parties of record via electronic mail on May 23, 2024.

- Ms. Marisa Lopez Wagley, Division Director, Legal Division
- Mr. John York Harrison, Senior Managing Attorney, Legal Division
- Kevin Pierce, Attorney assigned to this docket | PUCT's Legal Division.
- The MUD's Board via the MUD's Attorney (the law firm Schwartz, Page & Harding LLP).
- Attorneys from the law firm Lloyd Gosselink Rochelle & Townsend, P.C.

A handwritten signature in black ink, reading "George J. Wakileh". The signature is fluid and cursive, with a long horizontal stroke at the end.

George J. Wakileh, Ph.D.