



## **Filing Receipt**

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**Control Number - 56610**

**Item Number - 25**

**DOCKET NO. 56610**

<b>RATEPAYERS' APPEAL OF THE</b>	<b>§</b>	<b>PUBLIC UTILITY COMMISSION</b>
<b>DECISION BY LEROY-TOURS-GERALD</b>	<b>§</b>	
<b>WATER SUPPLY CORPORATION TO</b>	<b>§</b>	<b>OF TEXAS</b>
<b>CHANGE RATES</b>	<b>§</b>	
	<b>§</b>	

**LEROY TOURS GERALD WATER SUPPLY CORPORATION'S**  
**PROPOSED LIST OF ISSUES TO BE ADDRESSED IN THE DOCKET**

COMES NOW, the Leroy Tours Gerald Water Supply Corporation ("LTG") and files this it's proposed list of issues to be addressed in the docket and would show the following:

**I. PROCEDURAL HISTORY**

Petitioners filed their Ratepayers' appeal of the decision by Leroy Tours Gerald Water Supply Corporation to change rates (Petition) under Texas Water Code (TWC) § 13.043(b)(4) and 16 Texas Administrative Code (TAC) § 24.101 (c)(4) on May 14, 2024. On August 26, 2024, the Commission Counsel issued an Order Requesting Lists of Issues to be addressed in the docket by September 16, 2024, 2024, therefore this response is timely filed.

**II. LIST OF ISSUES**

LTG has identified the following list of issues to be addressed in this proceeding:

1. Considering only the only the information that was available to the LTG board of directors at the time the board made its decision and evidence of reasonable expenses incurred in the appeal proceedings, what are just and reasonable rates for LTG that are sufficient, equitable, and consistent in application to each customer class and that are not unreasonably preferential, prejudicial, or discriminatory?
2. What is the appropriate methodology to determine just and reasonable rates for LTG?

3. What is the revenue requirement that would give LTG sufficient funds to provide adequate retail water service?
4. What is the appropriate design of rates to recover LTG's revenue requirement?
5. What are the reasonable expenses incurred by LTG in this proceeding?
6. Should the Commission allow recovery of these reasonable expenses?
7. If so, what is the appropriate recovery mechanism?

### **III. ISSUES NOT TO BE ADDRESSED**

LTG has not identified any issues that should not be addressed in this docket.

Dated: September 13, 2024

Respectfully submitted,

BUENGER & ASSOCIATES, PLLC  
3203 Robinson Drive  
Waco, Texas 76706  
Telephone: 254/662-5888  
Fax: 254/662-6652  
BuengerLawFirm@gmail.com

BY: /s/ Daniel Adam Miles

DANIEL ADAM MILES

State Bar No. 24129638

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**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 September 13, 2024 in accordance with the Second Order Suspending Rules, issued in Project 50664.

/s/ Daniel Adam Miles

DANIEL ADAM MILES