



May 19, 2026

VIA EMAIL

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Re: Manville Water Supply Corporation Comments Regarding Groundwater Management Area 12 Desired Future Conditions

Groundwater Management Area 12 Representatives:

Manville Water Supply Corporation (“Manville WSC”) appreciates the opportunity to submit comments regarding the proposed Desired Future Conditions (“DFCs”) currently under consideration by Groundwater Management Area 12 (“GMA 12”).

Manville WSC is a nonprofit water supply corporation operating under a Certificate of Convenience and Necessity (“CCN”) 11144 issued by the Public Utility Commission of Texas (“PUC”). Manville WSC currently provides retail water service across a rapidly developing portion of Central Texas (Williamson, Lee, Travis and Bastrop Counties) and is responsible for maintaining continuous and adequate water service to existing customers, future customers within its certificated area, and critical public infrastructure throughout its service region.

As part of its long-term water supply strategy, Manville WSC relies upon groundwater supplies permitted within the Lost Pines Groundwater Conservation District (“Lost Pines GCD”) service area. Those groundwater resources are important not only for current operational reliability, but also for long-term planning associated with population growth, drought resiliency, emergency preparedness, fire protection capability, and regional water security.

Manville WSC recognizes the importance of responsible groundwater conservation and supports science-based planning efforts intended to protect aquifer resources for future generations. However, Manville WSC is concerned that certain proposed DFC approaches may not fully account for the operational realities and statutory obligations imposed upon retail public water systems serving high-growth regions of Texas.

Unlike private landowners or speculative projects, public water utilities cannot simply pause service, reduce obligations, or defer customer demand. Manville WSC is legally obligated to provide water service throughout its CCN area and must continuously plan years in advance ensure

adequate production capacity, transmission infrastructure, treatment capability, storage, and pressure maintenance throughout the system.

Groundwater availability directly impacts those planning efforts. Manville WSC has invested substantial public and ratepayer resources into regional infrastructure improvements based upon long-term water supply planning assumptions that include continued access to permitted groundwater supplies. Those investments include transmission mains, storage facilities, treatment infrastructure, emergency backup systems, and future supply interconnections intended to maintain reliable service throughout the region.

The practical effect of overly restrictive groundwater limitations would extend well beyond permit holders themselves. Reduced groundwater availability can directly affect system reliability, operational flexibility during drought conditions, fire flow capability, emergency response preparedness, and the ability of utilities to serve existing and future customers in accordance with state regulatory requirements.

Manville WSC is particularly concerned that regional groundwater planning decisions may unintentionally shift public water systems toward increasingly limited and significantly more expensive alternative water supplies without fully considering the financial and operational consequences to ratepayers and communities throughout Central Texas.

Texas Water Code Chapter 36 requires GMA 12 to balance groundwater conservation with the “highest practicable level of groundwater production” while also considering socioeconomic impacts and regional water supply needs. Manville WSC respectfully encourages GMA 12 to ensure that this balancing process fully considers the unique responsibilities placed upon public water systems operating under PUC oversight and serving rapidly growing service areas.

As Central Texas continues to experience unprecedented growth, regional water providers must retain the ability to responsibly develop diversified and reliable water supply portfolios capable of supporting both existing residents and future development. Groundwater resources within GMA 12 remain an important part of that long-term strategy.

Accordingly, Manville WSC respectfully requests that GMA 12 and its member districts:

- Continue utilizing transparent groundwater modeling and planning assumptions throughout the DFC process;
- Fully evaluate the operational and financial impacts that groundwater reductions may impose on retail public water systems and their customers;
- Consider the statutory obligations of certificated retail utilities that are required to maintain continuous water service and adequate system capacity;
- Give meaningful consideration to future regional growth, infrastructure planning, and long-term water supply reliability; and
- Adopt DFCs that preserve a balanced and practicable approach to groundwater management while allowing public utilities to continue meeting their public service obligations.

Manville WSC appreciates the opportunity to participate in this important regional planning process and respectfully requests that these comments be included within the official administrative record for the current DFC planning cycle.

Respectfully submitted,

A handwritten signature in black ink that reads "Erik Prinz". The script is cursive and fluid.

Erik Prinz
General Manager
Manville Water Supply Corporation