

BEFORE THE GUAM PUBLIC UTILITIES CORPORATION

**IN RE: PETITION FOR APPROVAL OF
GWA 'S THIRD FIVE-YEAR FINANCIAL
PLAN (BASE RATE INCREASES)**

GWA DOCKET 19-08



PETITION FOR LEAVE TO INTERVENE AND BECOME A PARTY;

Pursuant to Part 2, Rule 8 of the Rules of Practice and Procedure of the Public Utilities Commission of the Territory of Guam (PUC), this “Petition for Leave to Intervene and Become a Party” before the PUC (Docket No. 19-08) is respectfully submitted by the Department of the Navy on behalf of the Department of Defense (collectively referred to herein as DoD), by and through its attorneys.

As grounds for said intervention, Movant avers as follows:

1. Movant maintains numerous military installations within the Territory of Guam which activities obtain and use water and wastewater services from applicant Guam Waterworks Authority (GWA), a publicly regulated utility subject to this Commission’s jurisdiction. The nature and extent of DoD’s property, financial and other interests on Guam are substantial. DoD is one of the largest purchasers of water and wastewater services in the Territory of Guam. The DoD has been a party in other dockets related to revenue requirement or cost allocation and rate design issues. The DoD has a crucial and strategic interest in securing water and wastewater services at the lowest reasonable and nondiscriminatory cost.
2. The nature of the matters which are the subject of this docket could have a substantial impact on the Movant.
3. It is not unlikely that the Movant’s positions may be different from those advocated by

GWA, the Attorney General of Guam, or any other party to the proceeding.

4. Movant's participation can assist in producing complete and accurate discovery and developing a sound record. The DoD believes its participation will enable the Commission to view and consider all the pertinent available information.

5. Movant's intervention would serve the public interest in that this Movant expends funds on behalf of the taxpayers of the United States in the furtherance of the goals and objectives of the Government. It is in the taxpayers' interest to ensure that their tax dollars are (1) being spent to buy necessary goods and services that are reasonable in price, and (2) to ensure that the expertise available to their government is utilized to its maximum extent in ensuring the reasonableness and continued availability of the utility services to the Government and the general public at the least cost. Movant's intervention would not unreasonably broaden the issues or delay the proceedings in this docket.

6. Communications in regard to this petition are to be addressed to:

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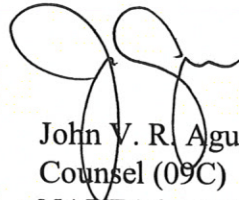
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WHEREFORE, Movant requests an order granting Movant's Petition for Leave to Intervene and Become a Party hereto with the right to have notice of, and appear at the taking of testimony, produce and cross examine witnesses, and be heard in person or by counsel, upon brief and at oral argument, if oral argument is granted, and to otherwise be granted full party status herein.

Dated this 18th day of May 2021.

Respectfully submitted,



John V. R. Aguon
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FPO AP 96540-2937
ATTORNEY FOR THE
DEPARTMENT OF DEFENSE

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CERTIFICATE OF SERVICE

I hereby certify, pursuant to Rule 4, that I filed eight copies of the Navy's PETITION FOR LEAVE TO INTERVENE AND BECOME A PARTY and this CERTIFICATE OF SERVICE, all dated 18 May 2021, with the Public Utilities Commission of Guam at:

Public Utilities Commission of Guam
Suite 207, GCIC Building
414 West Soledad Avenue
Hagatna, GU 96910

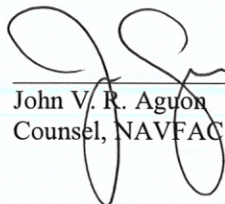
Additional copies were delivered this date to:

Kelly O. Clark
GWA Legal Counsel
Guam Waterworks Authority
P.O. Box 3010
Hagatna, Guam 96932

Tim Roberts
ROBERTS FOWLER & VISOSKY LLP
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