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APPLICATION OF QUADVEST, L.P. FOR A RATE/TARIFF CHANGE

PUBLIC UTILITY COMMESSION OF TEXAS

OF CELLA COMMISSIONES OF THE STATE OF THE ST

COMMISSION STAFF'S REQUEST FOR GOOD CAUSE EXCEPTION AND EXTENSION OF TIME

COMES NOW the Staff of the Public Utility Commission of Texas (Staff), representing the public interest and files this Request for Good Cause Exception and Extension of Time and would show the following:

I. BACKGROUND

On June 5, 2015, Quadvest, LP (Quadvest or Applicant) filed with the Public Utility Commission of Texas (Commission) an application for a rate/tariff change (Application) within the counties of Aransas Pass, Brazoria, Fort Bend, Harris, Jackson, Liberty, Matagorda, Montgomery, Walker and Waller and within the city of Richmond. Quadvest requests approval of the change in rates because it needs additional revenue to eliminate a present earnings deficiency. Quadvest proposed two phases of rate increases; one for new facilities already placed in service, the second for new facilities that will be placed in service. The effective date for the first phase of the proposed rate change is August 8, 2015. The effective date for the second phase of the proposed rate change is January 1, 2016. On June 12, 2015, the Commission issued Order No. 1 pursuant to 16 Tex. Admin. Code § 24.8(a) (TAC) and instructed Staff to provide a recommendation regarding (1) the administrative completeness of this application and notice, (2) how this application should be processed, and (3) the proposal of a procedural schedule by July 6, 2015.

II. REQUEST FOR GOOD CAUSE EXCEPTION AND EXTENSION OF TIME

On July 3, 2015, Staff requested a clarification from the Applicant regarding an issue that is determinative of sufficiency. As of the afternoon of July 6, 2015, Staff and the Applicant have not yet had the opportunity to clarify the issue. Although Staff expects that the issue will be clarified shortly, Staff requests a good cause exception to 16 TAC § 24.8(a), pursuant to 16 TAC

§ 22.5(b), that will allow Staff to file a sufficiency recommendation by July 13, 2015. Staff contacted the Applicant regarding this pleading, and the Applicant does not object.

III. **CONCLUSION**

Staff respectfully requests that the ALJ issue an order granting the above request.

Dated: July 6, 2015

Respectfully Submitted,

Margaret Uhlig Pemberton **Division Director** Legal Division

Stephen Mack Managing Attorney Legal Division

Douglas M. Brown Attorney, Legal Division State Bar No. 24048366 (512) 936-7203

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Public Utility Commission of Texas 1701 N. Congress Avenue

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DOCKET NO. 44809 CERTIFICATE OF SERVICE

I certify that a copy of this document will be served on all parties of record on or before July 6, 2015 in accordance with 16 TAC § 22.74.

Douglas M. Brown