



Control Number: 45552



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DOCKET NO. 45552

**APPLICATION OF OLD TAMINA §
WATER SUPPLY CORPORATION TO §
AMEND ITS WATER CERTIFICATE §
OF CONVENIENCE AND NECESSITY §
FOR DUAL CERTIFICATION WITH §
THE CITY OF SHENANDOAH IN §
MONTGOMERY COUNTY (37615-C) §**

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MOTION OF OLD TAMINA WATER SUPPLY CORPORATION FOR EXTENSION

NOW COMES Old Tamina Water Supply Corporation ("OTWSC") and hereby files this Motion for Extension of Time to File a Response to Order No. 12 Granting Request For Extension.

OTWSC respectfully requests an extension of time to file its response to Order No. 12 requiring OTWSC to respond to Commission Staff's First Request for Information. Order No. 12 required that OTWSC respond on or before January 31, 2018. Therefore, this Response and Request for Extension is timely filed.

OTWSC has worked with its Utility Operator and its Engineer to gather the information necessary to provide accurate responses to Staff Questions 1-1 & 1-2. However, because Staff Questions 1-1 & 1-2 relate to adequacy of capacity, OTWSC's response to those questions is also dependent upon the provisions of the pending renewal purchase water agreement between OTWSC and Chateau Woods MUD. Therefore, OTWSC intends to provide responses to those questions along with its response to Staff Question 1-3.

Staff Question 1-3 requests a copy of the purchase water agreement with Chateau Woods MUD. The purchase water agreement with Chateau Woods expired in August, and the parties are currently operating on a month-to-month basis under that agreement. The parties have successfully completed negotiations on the renewal term. Both parties and their respective legal

counsel have notified each other that the final version of the agreement has been approved for signature by the parties' respective authorized executives. As of today's date, OTWSC has made several attempts, but has not been able to reach the appropriate representative of Chateau Woods MUD to confirm if the agreement was signed at the MUD's Board Meeting that was scheduled for January 25, 2018, and to get a copy of the signed agreement so that OTWSC may also sign it.

OTWSC anticipates that it will successfully make contact with Chateau Woods MUD in the coming days so that the parties may complete execution of the agreement. However, OTWSC does not know at this time if execution by Chateau Woods MUD has already occurred, if it will occur in the next week, or if execution must wait until the MUD's next scheduled Board Meeting, which should occur on the fourth Thursday of the month, February 22, 2018. As soon as is practicable after receiving the signed agreement from Chateau Woods MUD, OTWSC will execute the agreement and file a copy of it with OTWSC's Response to Staff's RFI's.

OTWSC requests that the ALJ find good cause to extend the deadline for OTWSC to respond to Order No. 12.

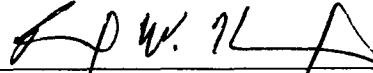
WHEREFORE, PREMISES CONSIDERED, OTWSC respectfully requests that the deadline for its response be extended to March 8, 2018. OTWSC respectfully requests the entry of an order consistent with this request.

Respectfully submitted,

OLD TAMINA WATER SUPPLY CORPORATION

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A handwritten signature in black ink, appearing to read 'R. W. Howard', is written over a horizontal line.

Richard W. Howard

State Bar No. 24099848

Ramond W. Howard

Texas Bar No. 10076800

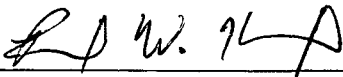
Email: ramond.howard@rwhpc-law.com

Attorneys for

Old Tamina Water Supply Corporation

CERTIFICATE OF SERVICE

I certify that a true and correct copy of this document will be served on all parties of record in this proceeding on January 31, 2018 in accordance with 16 TAC § 22.74.



Richard W. Howard