



Control Number: 46333



Item Number: 126

Addendum StartPage: 0

SOAH DOCKET NO. 473-17-2285.WS  
DOCKET NO. 46333

RECEIVED

APPLICATION OF PK-RE  
DEVELOPMENT COMPANY, INC.  
DBA GREENSHORES UTILITY  
SERVICES AND DBA OAK SHORES  
WATER SYSTEM FOR AUTHORITY  
TO CHANGE RATES AND TARIFFS  
IN TRAVIS COUNTY

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BEFORE THE STATE OFFICE  
2017 MAR 14 PM 12:30

PUBLIC UTILITY COMMISSION  
FILING CLERK

ADMINISTRATIVE HEARINGSS

GREENSHORES ON LAKE AUSTIN PROPERTY  
OWNERS' ASSOCIATION, INC.'S  
MOTION TO EXTEND TIME

TO THE HONORABLE ADMINISTRATIVE LAW JUDGE:

Greenshores on Lake Austin Property Owners' Association, Inc. ("Greenshores") files this Motion to Extend Time and would respectfully show as follows:

I. INTRODUCTION

PK-RE Development Company, Inc. dba Oak Shores Water System ("PK-RE") filed a Motion for Interim Rates on March 7, 2017. Greenshores' response is due March 14, 2017. Greenshores has filed this response timely.

Greenshores hereby requests additional time to respond to the motion. The Prehearing Conference in this matter is set for March 16, 2017. The undersigned reached out to the representative of PK-RE via email on March 8, 2017, and again on March 9, 2017, seeking to extend the response deadline to five business days after the preliminary hearing making the response due March 23, 2017. Counsel for Greenshores has received no response to that inquiry. However, through communication that counsel for Greenshores received from counsel for Undine on March 13, 2017, we understand that Mr. Eppright opposes our request.

II. ARGUMENT

Commission rules specifically provide that "After a hearing is convened, any party may petition the judge or commission to set interim rates." PUC Subst. Rule 24.29(b). The hearing in this matter has not been convened, and therefore the applicant has no authority to request interim rates as state in its motion filed on March 7, 2017.

126

### **III. PRAYER**

Greenshores respectfully requests that this Motion to Extend Time be granted, and that the deadline for response to PK-RE's motion for interim rates be March 23, 2017, five business days after the preliminary hearing, when PK-RE's is first authorized to file such a motion under the PUC rules.

Respectfully submitted,

By:   
John J. Carlton

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ATTORNEY FOR GREENSHORES ON LAKE  
AUSTIN PROPERTY OWNERS'  
ASSOCIATION, INC.

### **CERTIFICATE OF SERVICE**

I hereby certify that I have served or will serve a true and correct copy of the foregoing document via hand delivery, facsimile, electronic mail, overnight mail, U.S. mail and/or Certified Mail Return Receipt Requested to all parties on this the 14<sup>th</sup> day of March, 2017.

  
John Carlton