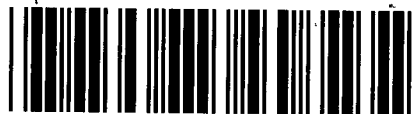




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PETITION OF 5732 WOODARD §
PARTNERS, LTD. TO AMEND G&W §
WATER SUPPLY CORPORATION'S §
CERTIFICATE OF CONVENIENCE §
AND NECESSITY IN WALLER §
COUNTY BY EXPEDITED RELEASE §

PUBLIC UTILITY COMMISSION

PUBLIC UTILITY COMMISSION
FILING CLERK

OF TEXAS

**PETITIONER'S RESPONSE TO COMMISSION STAFF'S FIRST ADMINISTRATIVE
COMPLETENESS RECOMMENDATION**

COMES NOW 5732 Woodard Partners, Ltd. (the "Petitioner"), by and through its counsel of record, Allen Boone Humphries Robinson LLP, and files this response to the Commission Staff's First Administrative Completeness Recommendation.

On June 6, 2017, Petitioner filed an application for streamlined expedited release of approximately 130 acres from G&W Water Supply Corporation's water certificate of convenience and necessity No. 12391 in Waller County, Texas. This petition is governed by Texas Water Code § 13.254(a-5) and 16 Texas Administrative Code § 24.113(l).


On June 7, 2017, the Commission administrative law judge issue Order No. 1, which established July 7, 2017 as Staff's deadline to file a recommendation regarding the administrative completeness of Petitioner's petition and notice.

On July 7, 2017, Commission Staff filed its First Administrative Completeness Recommendation, wherein Commission Staff recommended that Petitioner's petition be found deficient for failure to include a notarized affidavit in support of the required information to be included in the petition pursuant to 16 Texas Administrative Code § 24.113(l)(3)(A), and further recommending that Petitioner be given a deadline of July 21, 2017 by which to supplement its petition with the required affidavit. Therefore, this pleading is timely filed.

Attached hereto as **Exhibit A** is Petitioner's notarized affidavit in support of the required information included in the petition pursuant to 16 Texas Administrative Code § 24.113(l)(3)(A).

Dated: July 10, 2017

Respectfully submitted,

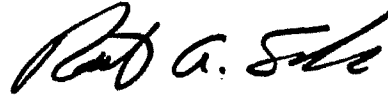
A handwritten signature in black ink, appearing to read "Robert A. Seale", written in a cursive style.

Robert A. Seale
Allen Boone Humphries Robinson LLP
Attorneys for Petitioner
3200 Southwest Freeway, Suite 2600
Houston, Texas 77027
(713) 860-6498
(713) 860-6698 (facsimile)
rseale@abhr.com
State Bar No. 24075046

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CERTIFICATE OF SERVICE

I certify that a copy of this document was served on all parties of record on July 10, 2017, in accordance with the requirements of 16 Texas Administrative Code § 22.74.

A handwritten signature in black ink, appearing to read "Robert A. Seale", written over a horizontal line.

Robert A. Seale

EXHIBIT A
AFFIDAVIT

DOCKET NO. 47263

AFFIDAVIT

THE STATE OF TEXAS §
 §
COUNTY OF WALLER §

BEFORE ME, the undersigned authority, on this day personally appeared Brendan N. Bosman, whom, being first duly sworn by me, upon his oath stated:

1. My name is Brendan N. Bosman, acting in my capacity as Managing Director of Värde Partners, Inc. I am of sound mind, more than eighteen (18) years of age, and am capable of making this affidavit.
2. 5732 Woodard Partners, Ltd., a Texas limited partnership (the "Petitioner") has submitted a Petition for Release from Certificate of Convenience and Necessity for Water Service (the "Petition") with the Public Utility Commission of Texas (the "Commission").
3. The Petition was submitted pursuant to Texas Water Code § 13.254(a-5) and 16 Texas Administrative Code § 24.113(r).
4. The Property (as defined in the Petition) is at least 25 contiguous acres in size.
5. The Property is subject to certificate of convenience and necessity no. 12391 for water service (the "CCN") held by G&W Water Supply Corporation, and is located in Waller County, Texas.
6. The Property is not receiving water service from the CCN holder.
7. The Petitioner owns the Property, as evidenced by the deed submitted with the Petition.
8. A copy of the Petition was mailed to the CCN holder via certified mail on the day the Petition was filed with the Commission.
9. The required mapping documents were submitted with the Petition.

[Execution Page Follows]

WITNESS MY HAND this 6th day of July, 2017.

5732 Woodard Partners, Ltd.,
a Texas limited partnership

By: 5732 Woodard GP, LLC, a Texas
limited liability company, its
general partner

By: AV RE 2, LLC, a Delaware
limited liability company, its sole
member

By: Värde Partners, Inc., its manager

By: Brendan N. Bosman
Name: Brendan Bosman
Title: Managing Director

THE STATE OF MINNESOTA §
 §
COUNTY OF HENNEPIN §

This instrument was acknowledged before me on the 6th day of
July, 2017, by Brendan N. Bosman of Värde Partners, Inc., on behalf of
5732 Woodard Partners, Ltd.

(NOTARY SEAL)



[Signature]
Notary Public