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DOCKET NO. 49280

**PETITION OF PREVILLAGE, LLC TO
AMEND HMW SPECIAL UTILITY
DISTRICT'S WATER CERTIFICATE
OF CONVENIENCE AND NECESSITY
IN HARRIS COUNTY BY EXPEDITED
RELEASE**

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**PUBLIC UTILITY COMMISSION
OF TEXAS**

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**QUADVEST, LP'S RESPONSE TO HMW SPECIAL UTILITY
DISTRICT'S REQUEST FOR ORAL ARGUMENT AND FOR LEAVE TO FILE AND
OBJECTION TO PROPOSED ORDER IN APPLICATION TO DECERTIFY**

COMES NOW Quadvest, LP ("Quadvest"), on behalf of Previllage, LLC ("Previllage"), and, pursuant to Order No. 4 (Docket No. 49280-13), responds to HMW Special Utility District's ("HMW") Request for Oral Argument and for Leave to File (Docket No. 49280-34, misidentified as being filed by Previllage, LLC) and Objection to Proposed Order in Application to Decertify (Docket No. 49280-36).

HMW's motions should be denied. The Proposed Order with Memo (Docket No. 49280-33) required that the parties submit corrections or exceptions to the Proposed Order on or before December 5, 2019. Not only did HMW miss that deadline by seven days (with no intervening request for extension), but the filing comes less than 24 hours before Commission consideration of the application (and with no notice to the undersigned, in conflict with Docket No. 10). While the undersigned is generally sympathetic to exigent circumstances, HMW's justification for the extreme delay and last-minute filing of its motions (the second HMW after-the-deadline filing in this docket (see Docket No. 49280-6)) is without sufficient merit to warrant consideration of HMW's motions and the undue prejudice such consideration would cause to Previllage.

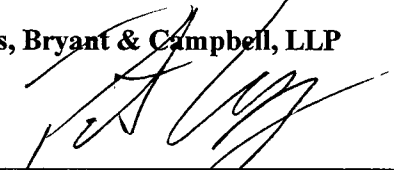
HMW has tried every procedural maneuver in this docket to deny Previllage its statutory right to expedited release from HMW's CCN. This latest maneuver, coming well after the deadline and at the last minute, should not be allowed. Certainly, HMW has had ample opportunity to present its position in this docket without the need for these late and last-minute motions.

Quadvest, on behalf of Previllage, urges that the Request for Oral Argument and for Leave to File and Objection to Proposed Order in Application to Decertify be denied and that the Proposed Order be considered without objection and without oral argument.

Respectfully submitted,

DuBois, Bryant & Campbell, LLP

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CERTIFICATE OF SERVICE

I certify that a true and correct copy of the foregoing document was served on the persons as indicated below on this the 12th day of December 2019:

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