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APPLICATION OF TIMBERCREST	§	PUBLIC UTILITY COMMISSION
PARTNERS LLC FOR AUTHORITY	§	
TO CHANGE RATES	§	OF TEXAS

**TIMBERCREST PARTNERS REQUEST TO UNABATE AND SET
PROCEDURAL SCHEDULE**

COMES NOW, Timbercrest Partners, LLC (“TCP”), and files this Request to Unabate and Set Procedural Schedule (with Expedited Hearing) and in support thereof, respectfully shows as follows:

TCP filed this application to change rates over two and a half years ago, on November 15, 2019. TCP has complied with all discovery requests and procedural requirements in this case. On July 12, 2021, the Administrative Law Judge (ALJ) abated this proceeding to allow the parties to attempt settlement before a State Office of Administrative Hearings (SOAH) ALJ. The parties mediated the case on July 20, 2022. Unfortunately, Staff needed additional information before it could consider a settlement proposal and thus, the mediation was essentially a technical conference rather than a mediation. TCP understands that Staff is extremely busy. However, each month that goes by without recovery of its revised rates, TCP is losing thousands of dollars. The parties have another date scheduled to mediate on August 15, 2022. However, in the interim, TCP requests that the ALJ unabate this proceeding and schedule a procedural conference to issue a procedural schedule. The parties will continue to attempt to mediate both informally and, if needed, with the mediator as scheduled. However, it is imperative the financial viability of the utility that this proceeding be on track for an expedited hearing on the merits should the parties be unable to reach a settlement.

Therefore, TCP respectfully requests that the ALJ unabate this proceeding and schedule a procedural conference to enter an expedited procedural schedule and grant all other relief, legal and equitable, to which it is justly entitled.

Respectfully submitted,

Shea & Associates, PLLC

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**ATTORNEYS FOR TIMBERCREST PARTNERS
LLC**

CERTIFICATE OF SERVICE

I hereby certify that a copy of this document will be served on all parties of record on July 22, 2022 in accordance with the Commission's Order in Docket 50664.

/s/ Tammy Shea
Tammy Shea