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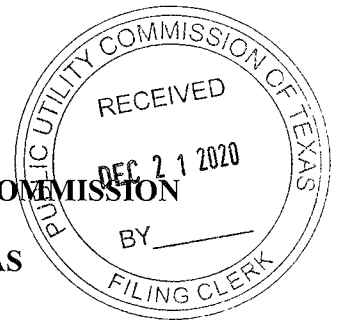
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DOCKET NO. 50244

APPLICATION OF QUADVEST LP
TO AMEND WATER CERTIFICATE
OF CONVENIENCE AND
NECESSITY IN HARRIS COUNTY

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PUBLIC UTILITY COMMISSION
OF TEXAS



**QUADVEST, LP'S RESPONSE TO HMW SPECIAL UTILITY DISTRICT'S
MOTION TO RECONSIDER ORDER NO. 10**

COMES NOW, Quadvest, L.P. ("Quadvest") and files this response to HMW Special Utility District's ("HMW") Motion to Reconsider Order No. 10. For the reasons set forth below, Quadvest requests that the Motion be denied.

I.

PROCEDURAL BACKGROUND

On November 30, 2020, HMW filed a "Motion to Intervene, Vacate Order, and Abate Proceeding." On December 8, 2020, the ALJ granted HMW's motion to intervene and denied HMW's request for reconsideration and motion to abate. On December 8, 2020, Quadvest filed its Response to Order No. 9 and Request for Reconsideration. On December 15, 2020 the ALJ entered Order No. 10 granting the request for reconsideration, denying motion to intervene and rescinding Order No. 9 in part. On December 15, 2020, HMW filed its Motion to Reconsider Order No. 10. Quadvest hereby requests that the ALJ deny HMW's motion to reconsider Order No. 10, based on the following discussion.

II.

DISCUSSION

By its motion to reconsider, HMW again seeks to impose itself into a process in a manner that is prohibited by law and nowhere found within the Commission's procedural rules. HMW again grasps well outside of any allowable procedural mechanism to challenge a completed Commission decertification. The fact that HMW has filed a baseless challenge in district court has no bearing on the subject docket, including any obligation to delay the proceeding in this docket in deference to that district court challenge. There is no basis in law to support HMW's

request for that kind of relief. It would be a stark deviation from Commission procedure to suspend a proceeding based on the pendency of a tangentially-related appeal to district court.

HMW's request for relief in its motion to reconsider is baseless. HMW is simply, once again, seeking to undo what was already properly done – the Commission's proper decertification of a portion of HMW's CCN. It seeks to do it outside of any valid Commission procedural mechanism.


III.

CONCLUSION

For the reasons stated, Quadvest respectfully requests that HMW's Motion to Reconsider Order No. 10 be denied.

Respectfully submitted,

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CERTIFICATE OF SERVICE

I certify by my signature above that on the 21st day of December, 2020, the foregoing document was served via email to the following:

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