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<b>PETITION OF STERLING DEASON</b>	<b>§</b>	<b>PUBLIC UTILITY COMMISSION</b>
<b>O'DONNELL AND DARWIN DEASON,</b>	<b>§</b>	
<b>CO-TRUSTEES OF THE STERLING</b>	<b>§</b>	
<b>DEASON O'DONNELL DD 2012 TRUST</b>	<b>§</b>	
<b>UNDER AGREEMENT OF THE DD 2014-</b>	<b>§</b>	
<b>B GRANTOR RETAINED ANNUITY</b>	<b>§</b>	<b>OF</b>
<b>TRUST TO AMEND MARILEE SPECIAL</b>	<b>§</b>	
<b>UTILITY DISTRICT'S CERTIFICATE</b>	<b>§</b>	
<b>OF CONVENIENCE AND NECESSITY IN</b>	<b>§</b>	
<b>COLLING COUNT BY EXPEDITED</b>	<b>§</b>	
<b>RELEASE</b>	<b>§</b>	<b>TEXAS</b>

**PETITIONER'S RESPONSE IN OPPOSITION TO MARILEE SPECIAL UTILITY DISTRICT'S REQUEST FOR ORAL ARGUMENT**

Sterling Deason O'Donnell and Darwin Deason, co-trustees of the Sterling Deason O'Donnell DD 2012 Trust under agreement of the DD 2014-B Grantor Retained Annuity Trust (the "Petitioner") files this Response in Opposition to Marilee Special Utility District's ("Marilee's") Request for Oral Argument and in support thereof, respectfully shows as follows:

This matter is set on the on the Public Utility Commission (the "Commission") Agenda for October 7, 2021. The proposed final order recommends decertification from Marilee's Certificate of Convenience and Necessity ("CCN") pursuant to Texas Water Code §13.2541. While Texas Administrative Code §22.262(d) does permit oral argument in certain instances, oral argument is not contemplated under the provisions regarding streamlined expedited release from a CCN found in Texas Water Code §13.2541 or Texas Administrative Code §24.245. Instead, Texas Water Code §13.2541(b) and Texas Administrative Code §24.245(h)(1) provide for streamlined expedited release from a CCN when the land to be released is: at least 25 acres, not receiving water or sewer service, and in a qualifying county. Texas Water Code §13.2541(c) and Texas Administrative Code §24.245(h)(7) further provide that the release occurs administratively 60 days after the Petition has been found administratively complete. Here,

Petitioner has met all of the above-described statutory requirements and the Petition is ripe for release. Accordingly, oral argument is not warranted in this matter.

For the above reasons, Petitioner respectfully requests that the Commission should deny Marilee's Supplemental Request for Oral Argument and grant Petitioner's Application for Streamlined Expedited Release.

Respectfully submitted,

**COATS ROSE, P.C.**

By:



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**ATTORNEYS FOR PETITIONERS**

**CERTIFICATE OF SERVICE**

I certify that a true and correct copy of this document was served on the following attorney of record on or before October 1, 2021 in accordance with 16 Tex. Admin. Code § 22.74(c).

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