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PUC DOCKET NO. 50404

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

**MARILEE SPECIAL UTILITY DISTRICT'S
REQUEST FOR ORAL ARGUMENT**

TO THE HONORABLE PUBLIC UTILITY COMMISSION:

COMES NOW, Marilee Special Utility District (the "District"), in the above styled and docketed appeal of the District's water rates and files this Request for Oral Argument.

On November 5, 2021, the District timely filed its Motion for Rehearing ("Motion") of the Order of the Public Utility Commission of Texas (the "Commission") that improperly decertified 259.5 acres of property from the District's Certificate of Convenience and Necessity in Collin County, Texas, through the streamlined expedited release mechanism found in Texas Water Code § 13.2541 and 16 Texas Administrative Code § 24.245(h).¹ Responses to the District's Motion are due no later than November 19, 2021.² On November 15, the Commission notified the parties that it will hear the District's Motion for Rehearing (the "Motion") at the Commission's open meeting on December 2, 2021.³

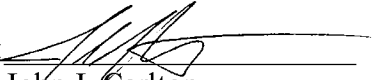
If the Commission would deem it helpful, the District respectfully requests the opportunity to provide oral argument at the December 2, 2021 hearing on the Motion.⁴ The Motion highlights

¹ Marilee Special Utility District's Motion for Rehearing (Nov. 5, 2021).
² See Tex. Gov't Code § 2001.146(b) ("A party must file with the state agency a reply, if any, to a motion for rehearing not later than the 40th day after the date the decision or order that is the subject of the motion is signed[.]").
³ Letter to All Parties of Record from Commission Advising (Nov. 15, 2021) (filed in docket).
⁴ 16 Texas Admin. Code ("TAC") § 22.262(d)(1) ("Any party may request oral argument before the

procedural, factual, and legal errors by the Commission and the Honorable Administrative Law Judge that resulted in improper decertification in this proceeding. Oral argument may be beneficial in providing context and clarification regarding the District’s arguments.

A request for oral argument “shall be filed no later than 3:00 p.m. on the seventh working day preceding the date upon which the commission is scheduled to consider the case.”⁵ Therefore, this request is timely filed.

Respectfully submitted,

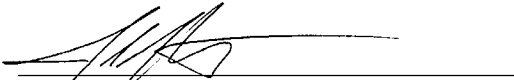
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ATTORNEYS FOR MARILEE SPECIAL
UTILITY DISTRICT

CERTIFICATE OF SERVICE

I hereby certify that I have served or will serve a true and correct copy of the foregoing document via hand delivery, facsimile, electronic mail, overnight mail, U.S. mail and/or Certified Mail Return Receipt Requested to all parties on this the 22nd day of November 2021.


John J. Carlton

commission prior to the final disposition of any proceeding.”).
⁵ 16 TAC § 22.262(d)(3).