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DOCKET NO. 50626

**APPLICATION OF QUADVEST, L.P.
TO AMEND ITS CERTIFICATES OF
CONVENIENCE AND NECESSITY
AND TO DECERTIFY PORTIONS OF
THE CITY OF CONROE'S
CERTIFICATES OF CONVENIENCE
AND NECESSITY IN MONTGOMERY
COUNTY**

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**PUBLIC UTILITY COMMISSION
OF TEXAS**

**COMMISSION STAFF'S REQUEST FOR EXTENSION OF TIME AND MOTION FOR
AMENDED PROCEDURAL SCHEDULE**

COMES NOW the Staff of the Public Utility Commission of Texas (Staff), representing the public interest, and files this Request for Extension of Time and Motion for Amended Procedural Schedule. In support thereof, Staff shows the following:

I. BACKGROUND

On March 6, 2020, Quadvest, L.P. (Quadvest) filed an application to amend its water certificate of convenience and necessity (CCN) No. 11612 and sewer CCN No. 20952 in Montgomery County. The application also seeks to decertify portions of the City of Conroe's water CCN No. 10339 and sewer CCN No. 20135. The requested service area consists of approximately 257 acres and no current customer connections. The City of Conroe filed a letter consenting to the requested decertification on June 29, 2020.

On September 28, 2020, the administrative law judge issued Order No. 5, which found Quadvest's notice sufficient and established a procedural schedule. Order No. 5 requires Staff to provide final maps, certificates, and tariffs to Quadvest by October 23, 2020. Therefore, this pleading is timely filed.

**II. REQUEST FOR EXTENSION OF TIME AND MOTION FOR AMENDED
PROCEDURAL SCHEDULE**

Pursuant to 16 Texas Administrative Code § 22.4(b), Staff may request that the time allowed for filing any documents be extended for good cause. Quadvest's application indicated that construction of certain facilities is needed to provide service to the requested area. Staff cannot continue processing the application until Quadvest submits proof that it has received approval from the Texas Commission on Environmental Quality for all construction plans and

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any necessary permits. Therefore, Staff requests the extension of its deadline to provide final maps, certificates, and tariffs to Quadvest and that the remaining deadlines in the procedural schedule be adjusted accordingly. As such, Staff proposes an amended procedural schedule as follows:

Event	Date
Deadline for Staff to provide final maps, certificates, and tariffs (if applicable) to Quadvest for review and consent	December 7, 2020
Deadline for Quadvest to file signed consent forms with the Commission	December 21, 2020
If no hearing is requested, deadline for Staff to file a final recommendation on the application	January 11, 2021
If no hearing is requested, deadline for parties to file joint proposed findings of fact and conclusions of law	January 18, 2021

III. CONCLUSION

Staff respectfully requests the entry of an order granting the requested extension of time and amending the procedural schedule.

Date: October 22, 2020

Respectfully submitted,

**PUBLIC UTILITY COMMISSION OF TEXAS
LEGAL DIVISION**

Rachelle Nicolette Robles
Division Director

Eleanor D'Ambrosio
Managing Attorney

/s/ Daniel Moore

Daniel Moore
State Bar No. 24116782
1701 N. Congress Avenue
P.O. Box 13326
Austin, Texas 78711
(512) 936-7465
(512) 936-7268 (facsimile)
Daniel.Moore@puc.texas.gov

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CERTIFICATE OF SERVICE

I certify that, unless otherwise ordered by the presiding officer, notice of the filing of this document was provided to all parties of record via electronic mail on October 22, 2020, in accordance with the Order Suspending Rules, issued in Project No. 50664.

/s/ Daniel Moore

Daniel Moore