



Control Number: 50626



Item Number: 21

Addendum StartPage: 0

RECEIVED

DOCKET NO. 50626

2020 DEC -7 AM 11:41

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 §

PUBLIC UTILITY COMMISSION
OF TEXAS

FILED IN CASE NO. 50626
FILING CLERK

**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. Quadvest filed a draft Texas Pollutant Discharge Elimination System permit issued by the Texas Commission on Environmental Quality (TCEQ) on December 1, 2020.

On October 23, 2020, the administrative law judge filed Order No. 6, requiring Staff to provide final maps, certificates, and tariffs to Quadvest and the City of Conroe by December 7, 2020. Therefore, this pleading is timely filed.

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

Under 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, as a result Quadvest must demonstrate that it has received approval from the TCEQ for all construction plans and any necessary permits. On December 1, 2020, Quadvest submitted a draft permit

approved by the TCEQ, However, Staff needs additional time to review the permit and make a recommendation. Therefore, Staff requests a two-week extension of its deadline to provide final maps, certificates, and tariffs to Quadvest. Staff further requests that the remaining deadlines in the procedural schedule be adjusted accordingly and 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 21, 2020
Deadline for Quadvest to file signed consent forms with the Commission	January 4, 2020
If no hearing is requested, deadline for Staff to file a final recommendation on the application	January 18, 2021
If no hearing is requested, deadline for parties to file joint proposed findings of fact and conclusions of law	February 1, 2021

III. CONCLUSION

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

Date: December 7, 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

DOCKET NO. 50626

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 December 7, 2020, in accordance with the Order Suspending Rules, issued in Project No. 50664.

/s/ Daniel Moore
Daniel Moore