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Received - 2022-06-28 02:11:21 PM Control Number - 50721 ItemNumber - 237

#### **DOCKET NO. 50721**

APPLICATION OF CRYSTAL CLEAR § PUBLIC UTILITY COMMISSION

WATER, INC. FOR AUTHORITY TO §
CHANGE RATES § OF TEXAS

## MOTION FOR EXTENSION OF TIME TO RESPOND TO ORDER REMANDING TO DOCKET MANAGEMENT

COMES NOW, Crystal Clear Water, Inc. (Crystal Clear), by and through its undersigned attorneys of record, and hereby files Motion for Extension of Time to Respond to Order Remanding to Docket Management (Motion), and in support thereof, would respectfully show as follows:

### I. BACKGROUND

On April 8, 2020, Crystal Clear, a Class D utility, filed its application to change rates for water service (Application) at the Public Utility Commission of Texas (the Commission). The Commission considered the Application and the Revised Unanimous Stipulation and Settlement Agreement at its Open Meeting on April 21, 2022. The Commission then filed an Order Remanding to Docket Management, providing a specific list of questions for Crystal Clear to answer (Order). On June 1, 2022, the ALJ issued Order No. 14 setting a deadline of June 30, 2022, for Crystal Clear to respond to the Order. Therefore, this Response is timely filed.

#### II. MOTION FOR EXTENSION OF TIME

Crystal Clear hereby requests that it be granted a 31-day extension of time, until Monday, August 1, 2022, to respond to the Order. Pursuant to 16 Tex. Admin. Code § 22.4(b), as long as the need for an extension is not caused by the party's neglect, indifference, or lack of diligence, it may request that the time allowed for filing any documents be extended for good cause. Crystal Clear, Commission Staff, Office of Public Utility Counsel (OPUC), and intervenor representatives met on June 8, 2022, to discuss issues raised by the Order and evidence to support Crystal Clear's response thereto. Crystal Clear has since been working on its response to the Order and would like to provide a copy to the other parties for review and comments prior to filing. Crystal Clear needs additional time to prepare and circulate its response with the other parties. Therefore, Crystal Clear seeks a 31-day extension until Monday, August 1, 2022.

#### III. CONCLUSION AND PRAYER

Based on the foregoing, Crystal Clear respectfully requests that the Commission grant a 31-day extension of time until Monday, August 1, 2022, to respond to the Order, and to grant all other relief as is necessary and property to effectuate the requests contained herein.

Respectfully submitted,

# LLOYD GOSSELINK ROCHELLE & TOWNSEND, P.C.

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ATTORNEYS FOR CRYSTAL CLEAR WATER, INC.

### **CERTIFICATE OF CONFERENCE**

The undersigned counsel certifies that she has conferred with counsel for Commission Staff regarding this Motion and that counsel for Commission Staff does not oppose this Motion. The undersigned counsel certifies that she also conferred with counsel for OPUC and that counsel for OPUC does not oppose this Motion.

Danielle Lam

## **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 U.S. first class mail or electronic mail on June 28, 2022, in accordance with the Order Suspending Rules, issued in Project No. 50664.

Danielle Lam