

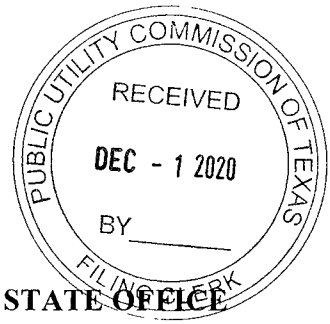


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**SOAH DOCKET NO. 473-20-4709.WS
PUC DOCKET NO. 50944**

**APPLICATION OF MONARCH § BEFORE THE STATE OFFICE
UTILITIES I, L.P. FOR AUTHORITY TO § OF
CHANGE RATES § ADMINISTRATIVE HEARINGS**

**COMMISSION STAFF'S MOTION TO ADOPT THE TESTIMONY OF
HEIDI GRAHAM**

COMES NOW the Staff (Staff) of the Public Utility Commission of Texas (Commission), representing the public interest, and files this Commission Staff's Motion to Adopt the Testimony of Heidi Graham. In support thereof, Staff would show the following:

I. BACKGROUND

On July 15, 2020, Monarch Utilities I, L.P. (Monarch) filed an application to change rates under Texas Water Code (TWC) § 13.187 and 16 Texas Administrative Code (TAC) § 24.27. On October 15, 2020, the State Office of Administrative Hearings (SOAH) Administrative Law Judge issued SOAH Order No. 3 unconditionally adopting a procedural schedule and establishing December 7, 2020 as the start date for a hearing on the merits of the application. On October 27, 2020, Staff filed the direct testimony of Heidi Graham.

II. MOTION TO ADOPT TESTIMONY

Heidi Graham may not be available on the hearing dates due to unforeseen circumstances. Therefore, Staff moves for leave to allow Roshan Pokhrel of the Commission's Infrastructure Division to adopt Ms. Graham's testimony, if necessary. Mr. Pokhrel is a colleague of Ms. Graham and has personal knowledge of the substance of Ms. Graham's testimony. No party would be prejudiced by allowing Mr. Pokhrel to adopt Ms. Graham's testimony because the parties have had a full opportunity to conduct discovery regarding the substance of the testimony.

III. CONCLUSION

Staff respectfully requests the issuance of an order consistent with the foregoing motion.

Dated: December 1, 2020

Respectfully submitted,

**PUBLIC UTILITY COMMISSION OF TEXAS
LEGAL DIVISION**

Rachelle Nicolette Robles
Division Director

/s/Courtney Dean

Rashmin J. Asher
State Bar No. 24092058
Megan Chalifoux
State Bar No. 24073674
Courtney N. Dean
State Bar No. 24116269
1701 N. Congress Avenue
P.O. Box 13326
Austin, Texas 78711-3326
(512) 936-7235
(512) 936-7268 (facsimile)
courtney.dean@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 December 1, 2020, in accordance with the Order Suspending Rules, issued in Project No. 50664.

/s/Courtney Dean

Courtney N. Dean