

Control Number: 51160



Item Number: 4

Addendum StartPage: 0



PUBLIC UTILITY COMMISSION PETITION OF CENTRAL BOWIE

COMMIS

RECEIVED

SEP 0 8 2020

888888 **COUNTY WATER SUPPLY OF TEXAS CORPORATION FOR CEASE AND** DESIST ORDER AGAINST CITY OF

**NEW BOSTON** 

# CITY OF NEW BOSTON'S NOTICE OF APPEARANCE OF COUNSEL AND MOTION TO EXTEND RESPONSE DEADLINES

City of New Boston ("New Boston") files this Notice of Appearance of Counsel and Motion to Extend Response Deadlines and respectfully shows and requests as follows:

## I. Notice of Appearance of Counsel

Pursuant to P.U.C. Proc. R. § 22.101(a), Leonard H. Dougal (Lead Counsel), Raymond W. Jordan, and Alisha Mehta enter an appearance as counsel on behalf of New Boston in this proceeding. Accordingly, New Boston requests that all correspondence, pleadings, briefs, requests for information, and all other documents in this proceeding be served upon:

> Leonard Dougal Raymond W. Jordan Alisha Mehta Jordan Law Firm, LLP Jackson Walker LLP 4 Woodmont Crossing Street

100 Congress Avenue, Suite 1100 Texarkana, TX 75503

Austin, Texas 78701 Telephone: (903) 831-6656 Facsimile: (903) 223-8598 Telephone: (512) 236-2233 Facsimile: (512) 391-2112 (Fax) Email: wes@jordanlawfirm.com

Email: ldougal@jw.com

#### II. Motion to Extend Deadlines

Central Bowie County Water Supply Corporation ("Central Bowie WSC") filed its Petition for a Cease and Desist Order Against the City of New Boston on August 12, 2020. Commission Order No. 1 required New Boston to file a response to Central Bowie's petition by September 2, 2020.

New Boston requests a 30-day extension of its response deadline to October 2, 2020 and a corresponding extension for PUC Staff's response. Good cause is shown for this extension request, as Lead Counsel for New Boston was not hired until after the September 2, 2020 deadline, due to administrative delays in part due to the COVID pandemic. Further, Petitioner, Central Bowie County WSC, and New Boston have entered into settlement discussions, and the time extension will facilitate those discussions.

Counsel for the Petitioner, Central Bowie County WSC, has agreed to this 30 day extension. To provide for adequate time for Commission's Staff's review of any responses, New Boston also requests a 30-day extension for the deadline for Commission Staff's response to October 12, 2020.

## III. Prayer

WHEREFORE, New Boston requests all pleadings and correspondence related to this proceeding be served on its counsel of record. New Boston also respectfully requests the adoption of the aforementioned 30-day extension of the response deadlines.

<sup>&</sup>lt;sup>1</sup> Petition of Central Bowie County Water Supply Corporation for Cease and Desist Order Against City of New Boston, Docket No. 51160, Order No. 1 (Aug. 14, 2020).

Respectfully submitted,

Leonard H. Dougal State Bar No. 06031400 Alisha Mehta State Bar No. 24102190 Jackson Walker LLP 100 Congress Avenue, Suite 1100

Lower Dogal

Austin, Texas 78701 Telephone: (512) 236-2233

Fax: (512) 391-2112 Email: ldougal@jw.com

Raymond W. Jordan State Bar No. 11016500 Jordan Law Firm, LLP 4 Woodmont Crossing Street Texarkana, Texas 75503 Telephone: (903) 831-6656

Fax: (903) 223-8598

Email: wes@jordanlawfirm.com

ATTORNEYS FOR CITY OF NEW **BOSTON** 

### **CERTIFICATE OF SERVICE**

Counsel hereby certifies that a true and correct copy of the above was served on all parties of record by September 8, 2020.

Leonard H. Dougal

Lower Dozal

3