



Control Number: 51398



Item Number: 19

Addendum StartPage: 0

**PUC DOCKET NO. 51398**

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**APPLICATION OF EAST CRAWFORD  
WATER CORPORATION AND NORTH  
BOSQUE WATER SUPPLY  
CORPORATION FOR SALE,  
TRANSFER, AND MERGER OF  
A PORTION OF WATER FACILITIES  
AND CERTIFICATE RIGHTS IN  
MCLENNAN COUNTY**

**§ PUBLIC UTILITY COMMISSION**  
**§**  
**§**  
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**§**  
**§**  
**§**  
**OF TEXAS**

**APPLICANTS' JOINT MOTION FOR EXTENSION**

**COMES NOW** East Crawford Water Supply Corporation (East Crawford) and North Bosque Water Supply Corporation (North Bosque) (collectively, Applicants) and file this Request for Extension. The Applicants have conferred with the Public Utility Commission (Commission) Staff (Staff) and Staff is unopposed to this Motion. The Applicants respectfully show the following:

**I. BACKGROUND**

On January 15, 2021, Applicants filed a joint motion for extension to finalize additional mapping and pursue a dual certification agreement with the City of Waco. On January 20, 2021 the Administrative Law Judge (ALJ) issued Order No. 5, granting the extension and requiring the Applicants to file supplemental mapping and cure the deficiencies found in the Application on or before February 15, 2021. February 15, 2021 was a Commission holiday and Applicants filed a Joint Motion for Extension based on unprecedented winter weather events on February 16, 2021. On February 18, 2021, the ALJ issued Order No. 6 granting the extension through February 26, 2021. On February 26, 2021, Applicants filed a joint motion for extension to continue pursuit of a dual certification agreement with the City of Waco. On March 1, 2021, the ALJ issued Order No. 7 granting extension through March 26, 2021. On March 26, 2021, Applicants filed a joint motion for extension to await a response from the City of Waco. On March 29, 2021, the ALJ issued Order No. 8 granting an extension through April 26, 2021. On April 27, 2021, Applicants filed a motion for extension to continue pursuit of a dual certification agreement with the City of Waco and await further instruction for supplemental mapping requirements from Commission Staff. On April 28,

2021, the ALJ issued Order No. 9 granting an extension through May 26, 2021. Therefore, this pleading is timely filed.

## **II. MOTION FOR EXTENSION**

Applicants, Commission Staff, and its GIS department have been conferring with respect to the supplemental mapping required to be submitted, but Applicants do not yet have the information from Commission Staff on the supplemental updates needed. Additional time is needed to complete that mapping in accordance with Commission Staff's guidance. Applicants continue to pursue a dual certification agreement and/or consent to serve from the City of Waco (City). The City recently provided its input to the Applicants. As Applicants and the City discussed options, Commission Staff provided additional information about the types of CCN applications permitted that likely alters the City and Applicants' options moving forward. Applicants are in discussions with the City regarding the possibility of amending the Application, as necessary, and working to coordinate any such amendments with Commission Staff's supplemental mapping requirements. Applicants respectfully request an extension through June 28, 2021, in order for the City of Waco to offer its input, and for Commission Staff to confirm supplemental requirements to Applicants. 16 Texas Administrative Code (TAC) § 22.4(b), provides that the time for filing documents may be extended upon a showing of good cause. The Applicants believe the additional time will provide the Applicants, Staff and the City time to evaluate and discuss, which time will lead to a more complete, productive docket. Wherefore, the Applicants respectfully request that their deadline to cure the deficiencies be extended to June 28, 2021.

## **III. CONCLUSION**

Wherefore, East Crawford and North Bosque respectfully move that the Commission issue an order granting Applicants' request and extend the deadline for Applicants to cure to June 28, 2021.

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Dated: May 26, 2021

Respectfully submitted,

**CARPENTER & CROFT, PLLC**

7901 Fish Pond Rd., Ste. 210

Waco, Texas 76710

T: (254) 300-7909

F: (409) 684-2806

By: Mary Margaret Croft

Mary Margaret Croft

State Bar No. 24082875

MaryMargaret@carpenterandcroft.com

**ATTORNEYS FOR EAST CRAWFORD  
WATER SUPPLY CORPORATION**

**SCANES & ROUTH, LLP**

7901 Fish Pond Rd., Ste. 200

P.O. Box 20965

Waco, Texas 76702-0965

T: (254) 399-8788

F: (254) 399-8780

By: /s/ James H. "Bo" Routh

James H. "Bo" Routh

State Bar No. 00797352

Routh@scanesrouth.com

**ATTORNEYS FOR NORTH BOSQUE  
WATER SUPPLY CORPORATION**

**CERTIFICATE OF SERVICE**

I certify that a copy of this document will be served on all parties of record on this the 26th day of May, 2021 in accordance with 16 TAC § 22.74.

Mary Margaret Croft  
Mary Margaret Croft

/s/ James H. "Bo" Routh

James H. "Bo" Routh