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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 COMMISSION

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. No 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,

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2021, the ALJ issued Order No. 9 granting an extension through May 26, 2021. On May 26, 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 May 27, 2021, the ALJ issued Order No. 10 granting an extension through June 28, 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's CCN counsel emailed the Applicants on June 24, 2021 to inform Applicants that the City would be unavailable to respond or update the Parties through the end of the City's retreat in late August, 2021. Applicants respectfully request an extension through September 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 September 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 September 28, 2021. STM Application of East Crawford and North Bosque Joint Motion for Extension

Dated: June 28, 2021

Respectfully submitted,

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By: And Andrew Prove

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CERTIFICATE OF SERVICE

I certify that a copy of this document will be served on all parties of record on this the 28th day of June, 2021 in accordance with 16 TAC § 22.74.

Mary Margaret Croft

<u>/s/ James H. "Bo" Routh</u> James H. "Bo" Routh