



## Filing Receipt

**Received - 2021-09-28 12:20:00 PM**  
**Control Number - 51398**  
**ItemNumber - 27**

**PUC DOCKET NO. 51398**

<b>APPLICATION OF EAST CRAWFORD</b>	<b>§</b>	<b>PUBLIC UTILITY COMMISSION</b>
<b>WATER CORPORATION AND NORTH</b>	<b>§</b>	
<b>BOSQUE WATER SUPPLY</b>	<b>§</b>	<b>OF TEXAS</b>
<b>CORPORATION FOR SALE,</b>	<b>§</b>	
<b>TRANSFER, AND MERGER OF</b>	<b>§</b>	
<b>A PORTION OF WATER FACILITIES</b>	<b>§</b>	
<b>AND CERTIFICATE RIGHTS IN</b>	<b>§</b>	
<b>MCLENNAN COUNTY</b>		

**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 December 22, 2020, Order No. 4 was issued in this Docket, finding the Application incomplete and deficient, and establishing an opportunity for the Applicants to cure the items listed in the PUC Memorandum from Patricia Garcia by January 15, 2021. 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 (the “City”). 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. 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. 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 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. On May 26, 2021, Applicants filed a motion for extension to continue pursuit of a dual certification agreement with the City 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. On June 28, 2021, Applicants filed a motion for extension to continue pursuit of a dual certification agreement with the City and await further instruction for supplemental mapping requirements from Commission Staff. On June 30, 2021, the ALJ issued Order No. 11 granting an extension through September 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. Also, Applicants continue to pursue a dual certification agreement and/or consent to serve from the City. Applicants are continuing to confer with Commission Staff and the City's CCN counsel regarding a dual certification agreement or consent to serve from the City. The City's counsel has indicated that the City is in the process of preparing a proposal for such an agreement or consent, and expects to have the proposal to Applicants within ten (10) days. Consequently, Applicants respectfully request an extension through November 19, 2021, to allow enough time to review and negotiate the terms of the City's proposal. 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 November 19, 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 November 19, 2021.

Dated: September 28, 2021

Respectfully submitted,

**CARPENTER & CROFT, PLLC**

7901 Fish Pond Rd., Ste. 210

Waco, Texas 76710

T: (254) 300-7909

F: (409) 684-2806

By: /s/ 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 28th day of September, 2021 in accordance with 16 TAC § 22.74.

/s/ Mary Margaret Croft  
Mary Margaret Croft

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