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PUC DOCKET NO. 51398

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

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 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 (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 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. 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. 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 the extension through September 28, 2021. On September 28, 2021, Applicants filed a joint motion for extension on the basis they did not have the City's proposed terms for a dual certification agreement and needed additional time for the City to provide the terms and each Applicant's board to review the terms. On September 29, 2021, the ALJ issued Order No. 12 granting the extension through November 19, 2021. On November 19, 2021, Applicants filed a joint motion for extension on the basis they were negotiating the proposed terms for a dual certification agreement and needed additional time to coordinate mapping with the City. On November 22, 2021, the ALJ issued Order No. 13 granting the extension through December 20, 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 sent proposed terms to Applicants on November 1, 2021. The Applicants are in various stages of negotiating terms with the City and revising mapping to supplement the Application. Applicants respectfully request an extension through February 18, 2022, in order for the City and the Applicants to finalize a dual certification agreement and

associated mapping, 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 February 18, 2022.

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 February 18, 2022.

Dated: December 17, 2021

Respectfully submitted,

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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 17th day of December, 2021 in accordance with 16 TAC § 22.74.

Mary Margaret Croft
Mary Margaret Croft

/s/ James H. "Bo" Routh
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