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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 Public Utility Commission (PUC or Commission) Staff (Staff) and Staff is not opposed 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. The Applicants have filed several motions for extension in order to further develop the facts and to pursue a dual certification agreement with the City of Waco. Most recently,

Applicants filed a joint motion for extension on June 16, 2022. On July 8, 2022, the ALJ issued Order No. 18 granting the extension through August 5, 2022. Therefore, this pleading is timely filed.

II. MOTION FOR EXTENSION

Applicants, Staff and the City of Waco have been conferring regarding the dual certification agreement and associated mapping. The City of Waco and East Crawford are currently reviewing and negotiating terms of a Dual Certification Agreement. The City of Waco will submit the Dual Certification Agreement at the city council meeting on August 17 or September 7 for approval. Applicants are working with their respective engineers to update mapping accordingly. Applicants respectfully request an extension through September 9, 2022, in order for the City and East Crawford 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 September 9, 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 September 9, 2022.

[Signature Page Follows]

Dated: August 5, 2022

Respectfully submitted,

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WATER SUPPLY CORPORATION

CERTIFICATE OF SERVICE

I certify that notice of filing of this document will be provided to all parties of record via electronic mail on this the 5th day of August, 2022 in accordance with the Order Suspending Rules, issued in Project No. 50664.

Mary Margaret Croft
Mary Margaret Croft

/s/ James H. "Bo" Routh

James H. "Bo" Routh