



Control Number: 51531



Item Number: 9

Addendum StartPage: 0

PUC DOCKET NO. 51531

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BEFORE THE
PUBLIC UTILITY COMMISSION
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**PETITION OF JLM 717 KAUFMAN LP, §
TO AMEND THE CITY OF §
CRANDALL'S WATER CERTIFICATE §
OF CONVENIENCE AND NECESSITY §
IN KAUFMAN COUNTY BY EXPEDITED §
RELEASE §
§**

PUBLIC UTILITY COMMISSION

OF TEXAS

UNOPPOSED MOTION FOR EXTENSION OF TIME

TO THE HONORABLE PUBLIC UTILITY COMMISSION OF TEXAS:

COMES NOW JLM 717 Kaufman, LP ("Petitioner"), and hereby files with the Public Utility Commission of Texas ("Commission") this Unopposed Motion for Extension of Time ("Motion") in the above-captioned matter. In support thereof, Petitioner would respectfully show as follows:

I. BACKGROUND

On November 17, 2020, Petitioner filed with the Commission the Petition of JLM 717 Kaufman, LP, to Amend the City of Crandall's Water Certificate of Convenience and Necessity in Kaufman County by Expedited Release ("Petition"), for the streamlined expedited release ("SER") of 45.8 acres of real property from the City of Crandall's ("Crandall") certificate of convenience and necessity ("CCN") No. 11295, under Tex. Water Code ("TWC") § 13.2541 and 16 Tex. Admin. Code ("TAC") § 24.245(h).

On December 11, 2020, Crandall moved to intervene; and, on December 21, 2020, the Commission Administrative Law Judge ("ALJ") granted Crandall's intervention.

On January 4, 2021, Commission Staff entered a recommendation "that the petition be deemed administratively incomplete and not accepted for filing due to deficient maps and digital data." Comm'n Staff Recommendation at 1.

On January 5, 2021, the ALJ entered Order No. 3, therein finding the Petition administratively incomplete and providing Petitioner until January 26, 2021, to supplement the Petition and to cure the deficiencies identified in Commission Staff's January 4, 2021, memorandum.

II. MOTION FOR EXTENSION OF TIME

Pursuant to 16 TAC § 22.4, "the time for filing any documents may be extended, upon the filing of a motion, prior to the expiration of the applicable period of time, showing that there is good cause for such extension of time and that the need for the extension is not caused by the neglect, indifference, or lack of diligence of the party making the motion."

Since the issuance of Order No. 3, Petitioner has worked diligently to resolve the mapping deficiencies identified in Commission Staff's January 4, 2021, memorandum ("Staff Memorandum"). Specifically, Petitioner has coordinated with Commission Staff in order to correct the mapping issues identified in the Staff Memorandum, as well as a matter concerning a one-acre tract within the approximately 717 acres that is the subject of the Petition. However, Petitioner needs additional time to finalize the mapping and to provide an affidavit and any accompanying exhibits that may be needed to sufficiently address the aforesaid said one-acre tract.

Further, Petitioner and Crandall have reached an agreement in principle regarding compensation matters that would be the subject of the second phase of these proceedings.

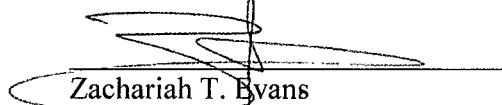
For these reasons, Petitioner respectfully asserts good cause exists for the ALJ to grant an extension of seven (7) days from the date of this filing for Petitioner to supplement the Petition.

Petitioner has coordinated with Commission Staff and legal counsel for Crandall regarding this Motion, and all parties are unopposed to the proposed request extension of time.

III. CONCLUSION AND PRAYER

For these preceding reasons, Petitioner respectfully requests that the ALJ grant Petitioner an additional seven (7) days from the date of this filing to supplement the Petition.

Respectfully submitted,



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ATTORNEYS FOR PETITIONER

CERTIFICATE OF SERVICE

I hereby certify that a true and complete copy of the above and foregoing document was served on the party indicated below as required by order or in accordance with 16 TEX. ADMIN. CODE § 22.74.

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