

Control Number: 51578



Item Number: 6

Addendum StartPage: 0

DOCKET NO. 51578

\$

APPLICATION OF MONARCH UTILITIES I L.P. TO AMEND ITS SEWER CERTIFICATE OF CONVENIENCE AND NECESSITY IN CHAMBERS COUNTY

PUBLIC UTILITY COMMISSION

age 1 of 3

1 7 2021

OF TEXAS

MONARCH'S REQUEST FOR EXTENSION OF TIME TO FILE SUPPLEMENT TO APPLICATION AND SUPPLEMENTAL RECOMMENDATION

Monarch Utilities I L.P. (Monarch) files this Request for Extension of Time to File Supplement to Application and Supplemental Recommendation with the Public Utility Commission of Texas (Commission), pursuant to Order No. 2 dated January 5, 2021.¹ In support, Monarch would show the following:

I. BACKGROUND

On December 3, 2020, Monarch filed its application to amend its sewer Certificate of Convenience and Necessity in Chambers County. On January 4, 2021, Commission Staff recommended that the content of the application be found administratively incomplete. On January 5, 2021, in Order No. 2, the Administrative Law Judge established February 18, 2021 as the deadline by which Monarch must file a supplemental application to cure the deficiencies described in Staff's recommendation. Order No. 2 further established February 25, 2021 as the deadline by which Commission Staff must file a supplemental recommendation regarding the administrative completeness of the application, with a proposed procedural schedule, if appropriate. This pleading is therefore timely filed.

¹ Order No. 2 Finding Application Administratively Incomplete, Establishing Deadlines and Opportunity to Cure (Jan. 5, 2021)

II. REQUEST FOR EXTENSION

Pursuant to 16 Texas Administrative Code § 22.4(b), Monarch requests to extend the deadline to file the supplement to application and the supplemental recommendation described in Order No. 2 to March 4, 2021, and March 11, 2021, respectively. Due to the current natural disaster declaration, the parties need additional time to address the deficiencies outlined in Commission Staff's recommendation. This request is not intended for the purpose of unnecessary delay, and has not been caused by neglect, indifference, or lack of diligence. Monarch conferred with Commission Staff, and they have agreed to Monarch's request.

III. CONCLUSION

Monarch respectfully requests the issuance of an order granting Monarch's request and extending the deadline to file a supplement to the application to March 4, 2021, and the deadline for Commission Staff to file a supplemental recommendation and proposed procedural schedule to March 11, 2021.

Respectfully submitted,

LLOYD GOSSELINK ROCHELLE & TOWNSEND, P.C. 816 Congress Avenue, Suite 1900 Austin, Texas 78701 (512) 322-5800 (512) 472-0532 (Fax)

/s/ Reid Barnes

LAMBETH TOWNSEND State Bar No. 20167500 ltownsend@lglawfirm.com

WILLIAM A. FAULK, III State Bar No. 24075674 cfaulk@lglawfirm.com

REID BARNES State Bar No. 24101487 rbarnes@lglawfirm.com

ATTORNEYS FOR MONARCH UTILITIES I L.P.

CERTIFICATE OF SERVICE

I certify that, unless otherwise ordered by the presiding officer, notice of the filing of this document was provided to all parties of record via electronic mail on February 17, 2021, in accordance with the Order Suspending Rules, issued in Project No. 50664.

/s/ Reid Barnes

REID BARNES

8199992/3176/22