



## Filing Receipt

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<b>APPLICATION OF L AND T</b>	<b>§</b>	<b>PUBLIC UTILITY COMMISSION</b>
<b>WATERWORKS LLC AND TEXAS</b>	<b>§</b>	
<b>WATER UTILITIES, L.P. FOR SALE,</b>	<b>§</b>	<b>OF TEXAS</b>
<b>TRANSFER, OR MERGER OF</b>	<b>§</b>	
<b>FACILITIES AND CERTIFICATE</b>	<b>§</b>	
<b>RIGHTS IN FREESTONE AND</b>	<b>§</b>	
<b>HENDERSON COUNTIES</b>	<b>§</b>	

**TEXAS WATER UTILITIES, L.P.'S**  
**UNOPPOSED MOTION FOR GOOD CAUSE EXCEPTION**

Texas Water Utilities, L.P. (TWU) files this Unopposed Motion for Good Cause Exception, and in support would show the following:

**I. BACKGROUND**

On March 8, 2021, TWU and L and T Waterworks LLC (L&T) filed their application for sale, transfer, or merger of facilities and certificate rights in Freestone and Henderson Counties. On December 19, 2022, the Commission administrative law judge (ALJ) issued Order No. 22 Finding Closing Documentation Sufficient and Establishing Procedural Schedule, setting the deadline for TWU and L&T to file signed consent forms with the Commission by January 24, 2023. On January 24, 2023, TWU filed a signed consent form concurring with the maps, tariffs, and certificates transmitted by Commission Staff via email on January 17, 2023.

**II. MOTION FOR GOOD CAUSE EXCEPTION**

TWU has reached out on numerous instances to request a signed consent form from L&T and has been unsuccessful in their attempts. Therefore, TWU requests a good cause exception to the procedural requirement that L&T file a signed consent form. Good cause to grant this exception exists due to L&T's non-responsiveness as well as the fact that pursuant to the revised bill of sale filed by Applicants on December 13, 2022, states that "Seller and Rayjeana Logan (as owner of Seller) each hereby agrees to (a) authorize Buyer to act *on their respective behalf* with respect to obtaining any necessary regulatory approvals with respect to the transactions contemplated by the APA, including any post-Closing regulatory approvals. . . ."<sup>1</sup> Commission Staff has been made aware of the issues underlying this request and is unopposed to such relief.

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<sup>1</sup> Revised Bill of Sale at 3 (Dec. 13, 2022) (emphasis added).

**III. CONCLUSION AND PRAYER**

TWU respectfully request that the ALJ grant its motion for good cause exception, and that the ALJ grant any further relief to which TWU is justly entitled.

Respectfully submitted,

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/s/ William A. Faulk, III

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**ATTORNEY FOR TEXAS WATER  
UTILITIES, 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 27, 2023, in accordance with the Order Suspending Rules, issued in Project No. 50664.

/s/ William A. Faulk, III

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William A. Faulk, III