



## **Filing Receipt**

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**Control Number - 51923**

**Item Number - 77**

**DOCKET NO. 51923**

<b>APPLICATION OF QUADVEST, L.P. TO</b>	<b>§</b>	<b>PUBLIC UTILITY COMMISSION</b>
<b>AMEND ITS WATER CERTIFICATE OF</b>	<b>§</b>	
<b>CONVENIENCE AND NECESSITY IN</b>	<b>§</b>	<b>OF TEXAS</b>
<b>MONTGOMERY COUNTY</b>	<b>§</b>	

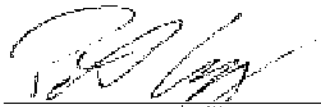
**APPLICANT’S RESPONSE TO STAFF’S REQUEST FOR EXTENSION**

On April 14, 2023, Commission Staff requested an extension of its April 14th deadline to file a supplemental recommendation regarding the administrative completeness of the subject application. On April 17<sup>th</sup>, the Administrative Law Judge granted that extension request. Quadvest, LP (“Quadvest”) hereby states its objection to any further Staff extension requests to the extent they are not supported by evidence of good cause pursuant to 16 Tex. Admin. Code § 22.4(b).

While Undine is sympathetic to Staff’s need for flexibility in meeting applicable docket deadlines, the fact is that since the ALJ issued Order No. 24 establishing a deadline of January 27, 2023 for Staff to present its final recommendation, Staff has either simply failed to meet the ordered deadlines or sought extensions extending the deadlines. Pursuant to the latest request and Order, Staff’s final recommendation is now due April 28<sup>th</sup>, three months after the original deadline. Staff has sought these extensions without notice to or consultation with Quadvest, and it has failed to respond to Quadvest’s several efforts to discuss the delays with Staff. Quadvest requests that the ALJ require that Staff present sufficient evidence of good cause pursuant to 16 Tex. Admin. Code § 22.4(b) and provide Quadvest an opportunity to respond before ordering any further delay in the processing of this docket.

Respectfully submitted,

**Gregg Law PC**



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**Attorneys for Quadvest, LP**

**DOCKET NO. 51923**

**CERTIFICATE OF SERVICE**

The undersigned hereby certifies 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 April 21, 2023 in accordance with the Order Suspending Rules issued in Project No. 50664.



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Peter T. Gregg