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PETITION OF MONTGOMERY	§	PUBLIC UTILITY COMMISSION
ESTATES, LLC TO AMEND CC	§	
WATER WORKS, INC.’S	§	OF TEXAS
CERTIFICATE OF CONVENIENCE	§	
AND NECESSITY IN CHAMBERS	§	
COUNTY BY EXPEDITED RELEASE	§	
	§	
<u>CC WATER WORKS, INC.’S CORRECTIONS TO PROPOSED ORDER</u>		

COMES NOW, CC Water Works, Inc. (“CCWW”) and files these corrections to the Proposed Order distributed by Administrative Law Judge (“ALJ”) Siemankowski on August 17, 2021. In the ALJ’s cover memorandum, he allowed the parties to file corrections or exception to the Proposed Order by September 1, 2021. Therefore, these corrections are timely filed. In support, CCWW shows the following:

I.

CORRECTIONS

CCWW asserts that the following Findings of Fact are incorrect, in that the record does not provide reasonable factual support for the findings to establish that CCWW has not “performed any act, furnished or supplied anything, or committed or used any facilities or lines to the decertified property.” V.T.C.A., Water Code § 13.254(a–5); Texas Gen. Land Off. v. Crystal Clear Water Supply Corp., 449 S.W.3d 130, 142 (Tex. App. 2014):

9. The petitioner sent a copy o the petition by certified mail, return receipt requested, to the CCN holder on or about March 24, 2021.

10. In Order No. 2 filed on April 28, 2021, the ALJ found the notice sufficient.

11. No motion to intervene were filed int his docket.

12. On May 4, 2021, the CCN holder filed response to the petition and a motion for leave to file a response.

27. The CCN holder has not committed or dedicated any facilities or lines to the release property for water service.

28. The CCN holder has no facilities or lines that provide water service to the release property.

29. The CCN holder has not performed any acts for or supplied anything to the release property.

CCWW further asserts that the Ordering Paragraphs set out in the proposed order should be revised consistent with the Findings of Fact and Conclusions of Law as corrected pursuant to this motion.

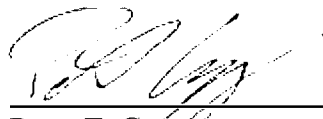
II.

CONCLUSION

For these reasons, CC Water Works, Inc. respectfully requests that the Administrative Law Judge modify the Proposed Order consistent with the corrections presented herein; deny the Petition; and grant all other and further relief to which it may be entitled

Respectfully submitted,

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CERTIFICATE OF SERVICE

By my signature above, I certify that on the 1st day of September, 2021, the foregoing document was serviced via first class mail and/or email to the following:

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