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DOCKET NO. 51973

PETITION OF RODNEY EARL	§	PUBLIC UTILITY COMMISSION
MOHNKE, STEPHEN LEE MOHNKE,	§	
MELVIN MAX MOHNKE, KENNETH	§	OF TEXAS
WAYNE MOHNKE, KATHLEEN ANN	§	
MOHNKE-BLAKELY, AND MEL	§	
MOHNKE, TRUSTEES OF THE	§	
MOHNKE LIVING TRUST, TO	§	
AMEND H-M-W SPECIAL UTILITY	§	
DISTRICT'S CERTIFICATE OF	§	
CONVENIENCE AND NECESSITY IN	§	
HARRIS COUNTY BY EXPEDITED	§	
RELEASE	§	

PETITIONER'S MOTION TO COMPEL

Rodney Earl Mohnke, Stephen Lee Mohnke, Melvin Max Mohnke, Kenneth Wayne Mohnke, Kathleen Ann Mohnke-Blakely and Mel Mohnke, Trustee of The Mohnke Living Trust dated December 7, 1996 (the "Petitioner") hereby files this Motion to Compel. In support thereof, Petitioner shows the following.

Order No. 5 set a deadline for Commission Staff to submit its appraiser's report within 100 days after the Commission approved the expedited release. The Commission approved the expedited release on November 2, 2022. Accordingly, Commission Staff's appraisal report was due no later than February 10, 2022.

Order No. 11, issued on February 1, 2022, denied Commission Staff's request for a revised procedural schedule and reaffirmed Commission Staff's deadline to submit its appraiser's report by the February 10, 2022 deadline.

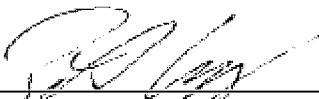
On February 18, 2022, eight days after Commission Staff's deadline to submit its appraiser's report, the Petitioner filed a Request for Clarification regarding Commission Staff's failure to comply with the appraisal report deadline (Docket Item No. 47). Commission Staff

filed a response requesting, again, twelve days after the deadline, an extension of the February 10, 2022 deadline. Order No. 12 again denied Commission Staff's request, emphasizing the "streamlined expedited" nature of the proceedings.

Commission Staff is now over thirty days past its deadline to submit Commission Staff's appraisal report, without explanation. Commission Staff's continued failure to recognize the ALJ's orders, and the underlying statute on which those orders are based, is causing the Petitioner substantial hardship. Accordingly, the Petitioner requests that the ALJ compel Commission Staff to submit the required appraisal report without any further delay and for such further relief as may be granted.

Respectfully submitted,

Gregg Law PC



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CERTIFICATE OF SERVICE

By my signature above, I certify that on the 14th day of March, 2022 the foregoing document was serviced via first class mail and/or email to the following:

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