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PUC DOCKET NO. 51979

PETITION BY SIG MAGNOLIA LP § BEFORE THE
FOR EXPEDITED RELEASE §
FROM WATER CCN NO. 11052 § PUBLIC UTILITY COMMISSION
HELD BY DOBBIN PLANTERSVILLE §
WATER SUPPLY CORPORATION § OF TEXAS

**AGREED MOTION FOR
EXTENSION TO RESPOND TO
SIG MAGNOLIA'S MOTION TO COMPEL**

TO THE PUBLIC UTILITY COMMISSION OF TEXAS:

COMES NOW, Dobbin Plantersville Water Supply Corporation (“Dobbin Plantersville” or Intervenor”) and files this Motion for Extension of Time and would show the following:

BACKGROUND

On April 5, 2021, Petitioner filed a petition with the Public Utility Commission of Texas (PUC) for expedited release from Dobbin Plantersville Water Supply Corporation’s (Dobbin Plantersville) water certificate of convenience and necessity (CCN) No. 11052 pursuant to Texas Water Code § 13.2541 and 16 Texas Administrative Code (TAC) § 24.245. Petitioner supplemented the petition with revised maps on April 26, 2021.

On May 4, 2021, Dobbin Plantersville filed a motion to intervene, which was subsequently granted. Dobbin Plantersville filed a response to the petition and a Motion to Dismiss on June 17, 2021.

On July 13, 2021, SIG Magnolia filed requests for information addressed to Dobbin Plantersville. On August 2, Dobbin Plantersville filed objections to select requests for information. On August 9, SIG Magnolia filed a motion to compel. Dobbin Plantersville response to the motion to compel is due on August 16.

REQUEST FOR EXTENSION

Under 16 TAC § 22.4(b), a party may request that the time allowed for filing any document be extended with a showing of good cause and that the need for the extension is not caused by the neglect, indifference, or lack of diligence of the party making the motion. In this instance, Dobbin Plantersville has only five working days to respond to SIG Magnolia's motion to compel. Today counsel has been informed that both the Intervenor's General Manager and its outside engineering consultant have contracted covid. They are the counsel's contacts for consultation on responding to the motion to compel.

Dobbin Plantersville has shown good cause for an extension and has shown that the need for the extension is not caused by its neglect, indifference, or lack of diligence.

CERTIFICATE OF CONFERENCE

Petitioner conferred with the parties by e-mail on August 11, 2021, regarding this Request. SIG Magnolia and Commission Staff agree to the proposed extension.

CONCLUSION AND PRAYER

Wherefore, the Petitioner respectfully requests that the Commission issue an order extending the deadline for responding to SIG Magnolia's motion to compel until August 25, or until such time that the General Manager and engineering consultant return to work.

Respectfully submitted,

Mary K. Sahs

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**ATTORNEY FOR DOBBIN
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COMPANY**

CERTIFICATE OF SERVICE

Pursuant to Docket No. 50664, Second Order Suspending Rules (July 16, 2020) the undersigned hereby certifies that a copy of foregoing Agreed Motion for Extension to Respond to SIG Magnolia's Motion to Compel was served on all parties of record in this proceeding on August 11, 2021, by electronic mail.

Mary K. Sahs

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