



## Filing Receipt

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**PUC DOCKET NO. 51979**

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

**AGREED SECOND MOTION FOR EXTENSION**

TO THE PUBLIC UTILITY COMMISSION OF TEXAS:

COMES NOW, Dobbin Plantersville Water Supply Corporation (“Dobbin Plantersville” or Intervenor”) and files this Agreed Second 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 10, which is within 20 days of the requests, Dobbin Plantersville filed a partial response to the requests for information.

On August 10, Dobbin Plantersville filed a motion to extend until August 24 the deadline to respond to SIG Magnolia's requests for information. The ALJ approved this motion in Order No. 9; therefore, this second motion for extension is timely filed.

On August 11, Dobbin Plantersville filed a motion to extend until August 25 the deadline to respond to SIG Magnolia's motion to compel. In Order No. 9 the ALJ deferred ruling on Dobbin Plantersville motion to extend until after its response to RFIs was filed. Therefore, this second motion for extension is timely filed in regard to the motion to compel.

### **REQUEST FOR EXTENSION**

Under 16 TAC § 22.4(b), the Petitioner 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 worked diligently to prepare its response to the requests for information. On the original filing deadline, Dobbin Plantersville filed a partial response to the RFIs. The Intervenor's General Manager is the primary preparer and sponsor of the responses, with assistance of Steve Duncan, consulting engineer. Unfortunately, the General Manager is now hospitalized, and all employees of Dobbin Plantersville, except the receptionist, are also out of the office because they are also ill, all with covid. Steve Duncan was also out ill with covid but has since returned to work. He may have information responsive to RFI No. 3 and if he does, Dobbin Plantersville intends to supplement its response by the deadline set in Order No. 9.

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 19, 2021, regarding this Request. SIG Magnolia and PUC Staff agree to the proposed extensions.

**CONCLUSION AND PRAYER**

Wherefore, the Dobbin Plantersville respectfully requests that the Commission issue an order extending the deadline for responding to SIG Magnolia’s requests for information until September 7, or until such time that the General Manager returns to work. Further, Dobbin Plantersville requests that the deadline for responding to SIG Magnolia’s motion to compel continue to be deferred until after Dobbin Plantersville files its complete response to RFIs.

Respectfully submitted,  
*Mary K. Sahs*  
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**ATTORNEY FOR DOBBIN  
PLANTERSVILLE WATER  
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 Second Motion for Extension was served on all parties of record in this proceeding on August 20, 2021, by electronic mail.

*Mary K. Sahs*  
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Mary K. Sahs