



## Filing Receipt

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<b>PETITION OF REDBIRD DEVELOPMENT, LLC</b>	<b>§</b>	<b>BEFORE THE</b>
<b>TO AMEND DOBBIN PLANTERSVILLE</b>	<b>§</b>	<b>PUBLIC UTILITY COMMISSION</b>
<b>WATER SUPPLY CORPORATION'S</b>	<b>§</b>	<b>OF TEXAS</b>
<b>CERTIFICATE OF CONVENIENCE</b>	<b>§</b>	
<b>AND NECESSITY IN MONTGOMERY COUNTY</b>	<b>§</b>	
<b>BY EXPEDITED RELEASE</b>	<b>§</b>	

**DOBBIN PLANTERSVILLE WSC'S MOTION FOR  
EXTENSION TO RESPOND TO  
REDBIRD'S REQUESTS FOR INFORMATION**

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 July 13, 2021, Redbird Development, Petitioner, 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.

### **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. The Intervenor's General Manager is the primary preparer and sponsor of the responses. Unfortunately, the General Manager has become ill during the last few days of preparation and her status is unknown. Counsel for Petitioner was alerted on August 9 that a partial response will be filed today and will be supplemented as soon as the General Manager returns to work.

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 10, 2021, regarding this Request. Redbird Development agrees to the proposed extension. No response was received from Commission Staff.

### **CONCLUSION AND PRAYER**

Wherefore, the Petitioner respectfully requests that the Commission issue an order extending the deadline for responding to Redbird Development's requests for information until August 24, or until such time that the General Manager returns to work.

Respectfully submitted,

*Mary K. Sahs*

**MARY K. SAHS, P.C.**

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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 Dobbin Plantersville Water Supply Corporation's Motion for Extension to Respond to Redbird's Requests for Information was served on all parties of record in this proceeding on August 10, 2021, by electronic mail.

*Mary K. Sahs*

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