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DOCKET NO. 52090

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

**AGREED MOTION FOR
EXTENSION TO FILE CORRECTIONS OR EXCEPTIONS TO
THE ALJ'S PROPOSED ORDER**

TO THE PUBLIC UTILITY COMMISSION OF TEXAS:

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

BACKGROUND

On May 6, 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.

On June 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 August 4, 2021, the Administrative Law Judge (“ALJ”) served on all parties a proposed order and set a deadline of August 18 for the parties to file corrections or exceptions to the proposed order. Dobbin Plantersville intends to file corrections and exceptions to the proposed order.

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 until August 18 to file exceptions to the proposed order and it intends to file exceptions and corrections. 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 corrections and exceptions to the proposed order.

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. Redbird Development and Commission Staff have agreed to the proposed extension.

CONCLUSION AND PRAYER

Wherefore, the Petitioner respectfully requests that the Commission issue an order extending the deadline for responding to filing corrections and exceptions to the ALJ's proposed order until August 25, or until such time that the General Manager and engineering consultant return to work.

Respectfully submitted,

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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 File Corrections and Exceptions to the ALJ's Proposed Order was served on all parties of record in this proceeding on August 11, 2021, by electronic mail.

Mary K. Sahs