



## Filing Receipt

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<b>PETITION OF ROSE HILL SPECIAL</b>	<b>§</b>	<b>PUBLIC UTILITY COMMISSION</b>
<b>UTILITY DISTRICT FOR CEASE AND</b>	<b>§</b>	
<b>DESIST ORDER AGAINST THE CITY</b>	<b>§</b>	<b>OF TEXAS</b>
<b>OF TERRELL FOR UNAUTHORIZED</b>	<b>§</b>	
<b>WATER SERVICE</b>	<b>§</b>	

**JOINT STATUS REPORT AND MOTION FOR EXTENSION OF ABATEMENT**

COME NOW, the City of Terrell, Texas (City), and Rose Hill Special Utility District (Rose Hill) (each, a Party, and collectively, the Parties), and file this Joint Status Report (Status Report) and Motion for Extension of Abatement (Motion). In support thereof, the Parties would respectfully show as follows:

**I. BACKGROUND**

On July 9, 2021, Rose Hill filed with the Public Utility Commission of Texas (Commission) a petition for cease and desist order against the City. On August 11, 2021, the Parties filed a Joint Motion to Abate this proceeding so that they might explore the possibility of reaching a mutually agreeable settlement of this matter. On August 12, 2021, the administrative law judge (ALJ) issued Order No. 4 in this proceeding, granting the requested abatement and requiring the Parties to file a status report or other appropriate pleading on or before November 9, 2021. On November 9, 2021, the City filed a Corrected Joint Status Report and Motion for Extension of Abatement. On November 10, 2021, the ALJ issued Order No. 5, granting the requested extension and requiring the Parties to file a status report or other appropriate pleading on or before January 10, 2022. Therefore, this pleading is timely filed.

**II. STATUS REPORT**

Since the issuance of Order No. 5, the Parties have continued working to resolve the issues central to this proceeding. Specifically, on December 3, 2021, Rose Hill provided the City with a response to the list of proposed settlement terms shared with Rose Hill by the City on November

5, 2021. Having reviewed and discussed their respective proposals but not yet reached a mutually agreeable settlement of this matter, it is the City's understanding that Rose Hill now intends to provide it with an updated settlement proposal in the near future.

### **III. MOTION FOR EXTENSION OF ABATEMENT**

The Parties hereby respectfully request a 14-day extension of the abatement of this proceeding, suspending all deadlines and activity in this Docket until Monday, January 24, 2022, to provide them with additional time to assess whether they can settle the issues in this proceeding. As such, the requested extension is not sought for delay but rather for the good cause of allowing the Parties to dedicate their time and resources toward resolving this matter in the manner most efficient for both the Parties and Commission.

Counsel for the City has communicated with counsel for Rose Hill regarding this Joint Status Report and Motion for Extension of Abatement, and such counsel has represented that Rose Hill supports the relief requested herein.

### **IV. CONCLUSION AND PRAYER**

For the reasons set forth above, the Parties respectfully request that the ALJ: (1) accept this Status Report; and (2) grant this Motion and all such other relief to which the Parties may be justly entitled.

Respectfully submitted,

**LLOYD GOSSELINK ROCHELLE &  
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**ATTORNEYS FOR ROSE HILL SPECIAL  
UTILITY DISTRICT**

**CERTIFICATE OF CONFERENCE**

The undersigned counsel certifies that she has conferred with counsel for Rose Hill Special Utility District regarding this Joint Status Report and Motion for Extension of Abatement and that such counsel agrees to the relief requested herein.

  
Maris M. Chambers

**CERTIFICATE OF SERVICE**

I certify that, unless otherwise ordered by the presiding officer, notice of the filing of this document was provided to all parties of record via electronic mail on January 10, 2022, in accordance with the Order Suspending Rules issued in Project No. 50664.

  
Maris M. Chambers