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DOCKET NO. 52482

PETITION OF BRENT DAVIS TO	§	PUBLIC UTILITY COMMISSION
DISCONTINUE SERVICE AND	§	
CANCEL THE CERTIFICATE OF	§	
CONVENIENCE AND NECESSITY OF	§	OF TEXAS
DREW T. SPENCER D/B/A	§	
CYPRESSWOOD ESTATES IN	§	
MONTGOMERY COUNTY	§	

MOTION FOR EXTENSION

COME NOW, Harrison Williams (Manager) and current Cypresswood Estates (CWE) owner Brent Davis and file this Motion for Extension, and in support thereof, would respectfully show the following:

I. BACKGROUND

On September 9, 2021, a Motion to Revoke Certificate of Convenience and Necessity (CCN) No. 12498 was filed with the Public Utility Commission of Texas (Commission). On June 26, 2024, the Commission Administrative Law Judge (ALJ) issued Order No. 17 finding the supplemented application administratively complete and directing CWE owner Mr. Davis to provide notice as described in Commission Staff's June 13, 2024 recommendation. Order No. 17 included a procedural schedule establishing a deadline of July 29, 2024 for Mr. Davis to file proof of notice.

II. MOTION FOR EXTENSION

As explained in Petitioner's Response to Order No. 13 and elsewhere, Temporary Manager (TM) and SP Utility Company, Inc. owner Harrison Williams has been acting on behalf of the CWE since being declared the TM by the Commission in 2019, including the responsibility to process bills, interact with customers and litigate this docket. Thus, the responsibility to provide notice in accordance with Commission Staff's June 13, 2024 recommendation has fallen to Mr. Williams. As the result of flooding and power outages from Hurricane Beryl, and their effect on CWE and the other small utilities owned and operated by Mr. Williams (for lengthy periods on

generator-power), however, he was not able to timely provide notice in accordance with Commission Staff's recommendation.

In light of the delay caused by Hurricane Beryl, Harrison Williams requests an additional 30-day extension to file the required proof of notice. Manager has conferred with the Commission Staff who are unopposed to this request. The requested extension is not sought for delay but for good cause and for purposes of judicial economy.

III. CONCLUSION

WHEREFORE, PREMISES CONSIDERED, TM Harrison Williams respectfully prays that the Commission ALJ grant it an additional 30-days to provide proof of notice, and for all other relief to which he may be entitled.

Respectfully submitted,

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By: _____
Helen S. Gilbert

**ATTORNEY FOR HARRISON
WILLIAMS AND SP UTILITY
COMPANY, INC.**

CERTIFICATE OF SERVICE

I hereby certify that I have or will serve a true and correct copy of the foregoing document via hand delivery, facsimile, electronic mail, overnight mail, U.S. mail, or Certified Mail Return Receipt Requested on all parties on the 29th of July 2024.



Helen S. Gilbert