



Filing Receipt

Received - 2021-11-22 01:54:25 PM
Control Number - 52553
ItemNumber - 7

DOCKET NO. 52553

APPEAL OF BROCOSKEY &	§	PUBLIC UTILITY COMMISSION
SHONNAH MAXIE APPEALING	§	
THE COST OF OBTAINING	§	OF TEXAS
SERVICE FROM THE	§	
CONSOLIDATED WATER	§	
SUPPLY CORPORATION	§	

**CONSOLIDATED WATER SUPPLY CORPORATION'S
OBJECTION TO REQUEST TO EXTEND TIME FOR MAXIES SUBMISSION**

COMES NOW Consolidated Water Supply Corporation ("Consolidated"), the respondent, and files this Objection To Request To Extend Time. This response is timely filed pursuant to the Public Utility Commission of Texas ("PUC" or "Commission") Order No. 1. In support of this objection, Consolidated respectfully shows the Commission as follows:

I. THE MAXIES' DEADLINE PASSED 25 DAYS AGO

In Order No. 2, the ALJ established a deadline of October 26, 2021 for the Maxies to cure deficiencies previously identified by Staff, to file proof that notice of the appeal was mailed to Consolidated WSC, and to file an amended appeal form with all the required enclosures listed in the instructions, including an updated written estimate from Consolidated WSC, if one was provided in response to the Maxies most recent application for service. That deadline was twenty-five (25) days ago. The Maxies did not ask for additional time prior to or after the deadline. The Commission staff belatedly ask for an extension on the Maxies' behalf, but did not allege any facts suggesting good cause exists for granting the extension.

II. DISMISSAL

This appeal should be dismissed because the Maxies failed to comply with Order No. 2.

III. PRAYER

For the foregoing reasons, Consolidated respectfully requests that the Commission (i) deny the staff's request late request to extend the time for the Maxies to cure the appeal; (ii) dismiss the Maxie's appeal for failing to meet the deadline set out in Order No. 2; and (iii) grant all other and further relief to which it is justly entitled.

Respectfully submitted,

DAVIDSON TROILO REAM & GARZA, P.C.

601 NW Loop 410, Suite 100
San Antonio, Texas 78216
Telephone: (210) 349-6484
Facsimile: (210) 349-0041

By: _____

Patrick W. Lindner
State Bar No. 12367850
Email: plindner@dtgrglaw.com
Paul M. González
State Bar No. 00796652
Email: pgonzalez@dtgrglaw.com

**Attorneys for Consolidated Water Supply
Corporation**

CERTIFICATE OF SERVICE

I hereby certify that on this 22nd day of November, 2021, a true and correct copy of the above and foregoing Objection to Request to Extend Time for Maxies' Submission was served by electronic delivery as follows:

Brocoskey and Shonnah Maxie
1138 FSR 513
Kennard, Texas 75847
ShonnahMaxie@gmail.com

Scott Miles
PUCT Staff Attorney
Public Utility Commission of Texas
1701 Congress Ave.
Austin, Texas 78711
scott.miles@puc.texas.gov

Patrick W. Lindner