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Received - 2021-11-22 02:35:57 PM
Control Number - 52556
ItemNumber - 6

DOCKET NO. 52556

PETITION OF MONTGOMERY	§	PUBLIC UTILITY COMMISSION
ESTATES, LLC TO AMEND GULF	§	
COAST AUTHORITY'S SEWER	§	OF TEXAS
CERTIFICATE OF CONVENIENCE AND	§	
NECESSITY NO. 20465 IN CHAMBERS	§	
COUNTY BY STREAMLINED	§	
EXPEDITED RELEASE UNDER TEXAS	§	
WATER CODE § 13.2541 AND 16	§	
TAC § 24.245(h)	§	

**MONTGOMERY ESTATES, LLC'S RESPONSE TO
COMMISSION STAFF'S RECOMMENDATION ON FINAL DISPOSITION**

COMES NOW, Montgomery Estates, LLC (Montgomery Estates), by and through its undersigned attorneys of record, and hereby files this Response to Commission Staff's Recommendation on Final Disposition (the Response). In support thereof, Montgomery Estates would respectfully show as follows:

I. BACKGROUND

On September 13, 2021, Montgomery Estates filed its Petition to Amend Gulf Coast Authority's (the Authority's) Water Certificate of Convenience and Necessity (CCN) in Chambers County, Texas by Streamlined Expedited Release Under Texas Water Code (TWC) § 13.2541 and 16 Texas Administrative Code (TAC) § 24.245(h) (the Petition) at the Public Utility Commission of Texas (the Commission). Administrative Law Judge (ALJ) Denmark issued Order No. 2 on October 14, 2021, finding the petition administratively complete and establishing a procedural schedule, setting: (i) a deadline of November 3, 2021 for the Authority to file a response to the administratively complete Petition; (ii) a deadline of November 17, 2021 for Commission Staff to file a recommendation on final disposition; and (iii) a deadline of November 24, 2021 for Montgomery Estates to file a reply to both the Authority's response, if any, and Commission Staff's recommendation on final disposition. Then, on November 17, 2021, Commission Staff

filed their Recommendation on Final Disposition (Recommendation), requesting that the Petition be approved and an order be issued consistent with the Recommendation. As of the date of this Response, Gulf Coast has not filed a response to the Petition. Therefore, this Response is timely filed.

II. RESPONSE TO STAFF'S RECOMMENDATION ON FINAL DISPOSITION

Montgomery Estates agrees with Commission Staff's Recommendation that the ALJ: (i) approve the Petition for streamlined expedited release from the Authority's CCN No. 20465 in Chambers County; and (ii) issue an order consistent with that Recommendation.

III. CONCLUSION AND PRAYER

For these reasons, Montgomery Estates, LLC, respectfully requests that the presiding Administrative Law Judge: (i) find that the Petition is administratively complete; (ii) issue an order approving the Petition; and (iii) grant all other and further relief to which it may be entitled.

Respectfully submitted,

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**ATTORNEYS FOR MONTGOMERY
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CERTIFICATE OF SERVICE

I hereby certify that a true and correct copy of the foregoing document was transmitted by fax, hand-delivery, and/or regular, first class mail on this the 22nd day of November, 2021 to the parties of record, in accordance with the Order Suspending Rules, issued in Project No. 50664.



David J. Klein