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PUC DOCKET NO. 52641

PETITION OF CR FARMS, LLC TO	§	BEFORE THE
AMEND SOUTH CLEVELAND WATER	§	
SUPPLY CORPORATION'S	§	
CERTIFICATE OF CONVENIENCE	§	PUBLIC UTILITY COMMISSION
AND NECESSITY IN LIBERTY	§	
COUNTY BY EXPEDITED RELEASE	§	OF TEXAS

**SOUTH CLEVELAND WATER SUPPLY CORPORATION'S
RESPONSE TO PETITION OF CR FARMS, LLC**

COMES NOW, South Cleveland Water Supply Corporation ("South Cleveland"), and pursuant to Order No. 1, files this Response to the Petition for Streamlined Expedited Release ("Response") of CR Farms, LLC ("CR Farms" or "the Petitioner") in the above-styled proceeding under 16 TEX. ADMIN. CODE § 24.245 and TEX. WATER CODE § 13.2541. In support thereof, South Cleveland respectfully shows the following:

I. Authorized Representative

South Cleveland's authorized representatives for this proceeding are:

Mr. Duncan C. Norton
Mr. Samuel L. Ballard
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sballard@lglawfirm.com

South Cleveland requests that all correspondence, pleadings, briefs, requests for information, responses to requests for information, and all other documents in this proceeding be served upon its authorized representatives.

II. Response

On September 27, 2021, CR Farms filed a Petition for Streamlined Expedited Release (“the Petition”) from South Cleveland’s water certificate of convenience and necessity (“CCN”) number 12566 under 16 TEX. ADMIN. CODE § 24.245(h) and TEX. WATER CODE § 13.2541. CR Farms asserts that the land to be released and located within the boundaries of South Cleveland’s CCN is approximately 2,405 acres, is not receiving water service, and is located in Liberty County.

On September 29, 2021, the Honorable Administrative Law Judge issued Order No. 1 establishing a deadline for South Cleveland, as the CCN holder, to file its response to CR Farms’ Petition.

On October 27, 2021, Staff for the Public Utility Commission of Texas (“PUC Staff”) filed its Recommendation on Administrative Completeness, recommending that CR Farms’ Petition be found administratively incomplete. South Cleveland has no opinion on PUC Staff’s recommendation.

On October 28, 2021, the Honorable Administrative Law Judge issued Order No. 2, establishing a deadline for CR Farms to cure the deficiencies identified by PUC Staff and a deadline for PUC Staff to file a supplemental recommendation.

South Cleveland reserves the right to provide a substantive response to CR Farms’ Petition if and when it is declared administratively complete. Furthermore, South Cleveland asserts that it is entitled to compensation under 16 TEX. ADMIN. CODE § 24.245(i) and TEX. WATER CODE §13.2541, if CR Farms’ Petition is granted and South Cleveland’s CCN area is reduced.

III. Conclusion and Prayer

For these reasons, South Cleveland respectfully requests that (1) South Cleveland be given the opportunity to respond to CR Farms' Petition if and when it is declared administratively complete; and (2) South Cleveland be granted all further relief to which it may be justly entitled.

Respectfully submitted,

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/s/ Samuel L. Ballard

SAMUEL L. BALLARD
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**ATTORNEYS FOR SOUTH CLEVELAND
WATER SUPPLY CORPORATION**

CERTIFICATE OF SERVICE

I hereby certify that a copy of the foregoing document was transmitted to all parties of record via electronic mail on November 3, 2021, in accordance with the Order Suspending Rules issued in Project No. 50664.

/s/ Samuel L. Ballard

SAMUEL L. BALLARD