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| <b>APPLICATION OF TERRA</b>       | <b>§</b> | <b>PUBLIC UTILITY COMMISSION</b> |
| <b>SOUTHWEST, INC. AND UNDINE</b> | <b>§</b> |                                  |
| <b>DEVELOPMENT, LLC FOR SALE,</b> | <b>§</b> | <b>OF TEXAS</b>                  |
| <b>TRANSFER, OR MERGER OF</b>     | <b>§</b> |                                  |
| <b>FACILITIES AND CERTIFICATE</b> | <b>§</b> |                                  |
| <b>RIGHTS IN DENTON COUNTY</b>    | <b>§</b> |                                  |

**COMMISSION STAFF’S REQUEST FOR EXTENSION**

**I. INTRODUCTION**

On November 16, 2021, Terra Southwest, Inc. (Terra) and Undine Development, LLC (Undine Development), filed an application for approval of the sale, transfer, or merger of facilities and certificate of convenience and necessity (CCN) rights in Denton County. On August 26, 2022, the application was supplemented to replace Undine Development with Undine Texas, LLC (Undine Texas).

On December 20, 2022, the administrative law judge (ALJ) filed Order No. 20, requiring parties to clarify a number of issues by January 6, 2023. Therefore, this pleading is timely filed.

**II. REQUEST FOR EXTENSION**

Under 16 Texas Administrative Code (TAC) § 22.4(b), Staff may request that the time allowed for filing any documents be extended for good cause. Staff needs additional time to review the application before submitting the clarifications required by the ALJ. Accordingly, Staff respectfully requests that the deadline for Staff to file clarifications be extended until January 18, 2023. Staff has conferred with counsel for Undine and is authorized to represent they support the proposed extension. Staff also conferred with counsel for Terra and is authorized to represent they are unopposed to the proposed extension.

**III. CONCLUSION**

For the reasons stated above, Staff respectfully requests that its deadline to file clarifications be extended until January 18, 2023.

Dated: January 5, 2023

Respectfully Submitted,

**PUBLIC UTILITY COMMISSION OF TEXAS  
LEGAL DIVISION**

Keith Rogas  
Division Director

John Harrison  
Managing Attorney

/s/ Ian Groetsch  
Ian Groetsch  
State Bar No. 24078599  
1701 N. Congress Avenue  
P.O. Box 13326  
Austin, Texas 78711-3326  
(512) 936-7465  
(512) 936-7268 (facsimile)  
Ian.Groetsch@puc.texas.gov

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**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 5, 2023, in accordance with the Order Suspending Rules, issued in Project No. 50664.

/s/ Ian Groetsch  
Ian Groetsch