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PETITION OF 2021 FII WALNUT	§	BEFORE THE
SPRINGS, LLC TO AMEND SPRINGS	§	
HILL WATER SUPPLY	§	
CORPORATION'S CCN NO. 10666 IN	§	PUBLIC UTILITY COMMISSION
GUADALUPE COUNTY BY	§	
STREAMLINED EXPEDITED	§	OF TEXAS
RELEASE	_	

JOINT MOTION TO ABATE

COMES NOW, 2021 FII Walnut Springs, LLC ("Petitioner") and Springs Hills Water Supply Corporation ("Springs Hills") (collectively, "Parties") and submits this Joint Motion to Abate, and in support thereof, would respectfully show the following:

On February 8, 2022, Petitioner filed a Petition to Amend Springs Hill's water Certificate of Convenience and Necessity ("CCN") No. 10666 by streamlined expedited release ("SER"). On October 6, 2022, the Public Utility Commission of Texas ("Commission") issued an Order releasing two non-contiguous tracts of 104.60 and 96.02 acres, respectively. Since the SER Petition was filed and thereafter, the Parties have been engaged in settlement negotiations. However, the Parties believe that abating the proceeding so that the Parties could reach an agreement on compensation would be more conducive to settlement. Petitioner conferred with Commission Staff who is not opposed to the abatement. Such abatement is not sought for purposes of delay but for judicial economy. Accordingly, the Parties request an abatement to this proceeding for approximately 60 days.

WHEREFORE, PREMISES CONSIDERED, Petitioner 2021 FII Walnut Springs, LLC and Springs Hill Water Supply Corporation respectfully pray that the Commission grant the Joint Motion to Abate and establish a deadline in 60 days requiring the Parties to file a report on the status of settlement, and for all other such relief to which they are entitled.

Joint Motion to Abate

Respectfully submitted,

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By:

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ATTORNEYS FOR SPRINGS HILL WATER SUPPLY CORPORATION

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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 12th day of October 2022.

Helen S. Gilbert

Helm S. Gilbert