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#### **DOCKET NO. 53299**

CRYSTAL BLUFF GOAT RANCHES,	§	PUBLIC UTILITY COMMISSION
LLC'S APPEAL OF THE COST OF	§	
OBTAINING SERVICE FROM	§	OF TEXAS
POSSUM KINGDOM WATER	§	
SUPPLY CORPORATION	§	

# CRYSTAL BLUFF GOAT RANCHES, LLC'S REQUEST FOR HEARING

COMES NOW Crystal Bluff Goat Ranches, LLC, and files this Request for Hearing, and would respectfully show unto the Commission as follows:

## **FACTS**

- 1. On June 22, 2022, the Administrative Law Judge issued Order No. 6 Amending Procedural Schedule requiring the parties to respond to the Commission Staff's recommendation or to request a hearing by August 18, 2022.
- 2. On July 18, 2022, the Commission Staff filed a Request for Hearing and Referral to the State Office of Administrative Hearings. The Commission's Request for Hearing was based on "unresolved questions of fact" and the need to develop an evidentiary record regarding the exorbitant contribution-in-aid-of-construction ("CIAC") fee levied against Crystal Bluff Goat Ranches, LLC, by Possum Kingdom Water Supply Corporation. In addition to being wildly inconsistent with prior dealings between the parties, the CIAC fee is unreasonably preferential, prejudicial, discriminatory, and likely unlawful.<sup>1</sup>

### **PRAYER**

WHEREFORE, PREMISES CONSIDERED, Crystal Bluff Goat Ranches, LLC, respectfully requests that an order be issued setting this matter for a hearing on the merits before the State Office of Administrative Hearings.

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<sup>&</sup>lt;sup>1</sup> TWC §13.043(j) and 13.136; 16 TAC § 24.163.

# Respectfully submitted,

## DORSETT JOHNSON & SWIFT, LLP

By: /s/ C. Justin Broome

JC Johnson

Texas Bar No. 24067412

Email: jcjohnson@dorsettjohnson.com

S. Joseph Modric

Texas Bar No. 24096420

Email: jmodric@dorsettjohnson.com

Kasey Rachel

Texas Bar No. 24075849

Email: krachel@dorsettjohnson.com

C. Justin Broome

Texas Bar No. 24117555

Email: jbroome@dorsettjohnson.com 407 Throckmorton Street Suite 500

Fort Worth, Texas 76102

Tel. (817) 900-8202

Fax. (817) 882-8526

ATTORNEYS FOR CRYSTAL BLUFF GOAT RANCHES, LLC

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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 August 18, 2022, in accordance with the Order Suspending Rules, issued in Project No. 50664.

/s/ C. Justin Broome

C. Justin Broome