



Filing Receipt

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

**POSSUM KINGDOM’S RESPONSE TO CRYSTAL BLUFF GOAT RANCHES, LLC’S
REQUEST FOR EXTENSION TO FILE PREFILED TESTIMONY AND EXHIBITS**

COMES NOW, Possum Kingdom Water Supply Corporation (Possum Kingdom), and files this response to Crystal Bluff Goat Ranches, LLC’s (CBGR) Request for Extension to File Prefiled Testimony and Exhibits. In support, Possum Kingdom shows as follows.

RESPONSE

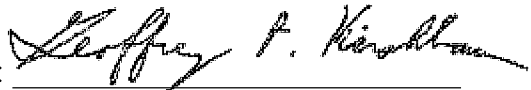
On October 4, 2022, CBGR agreed to the procedural schedule the parties jointly filed in this docket which placed CBGR’s deadline for prefiled direct testimony and exhibits on December 1, 2022. The day before that deadline, on November 30, 2022 at approximately 9:37 a.m., CBGR’s counsel reached out to the undersigned to confer about a four-week extension of that deadline.

CBGR’s counsel informed the undersigned that the reason for CBGR’s request was CBGR recently decided to retain new additional counsel for its case. The undersigned was in a medical appointment with his wife in Houston when the initial request was made and could not respond until 12:45 p.m. The undersigned asked several questions about the request and indicated that the undersigned would need to confer with Possum Kingdom about it. At 2:02 p.m., while the undersigned was in transit from Houston, CBGR’s counsel responded and indicated Staff had agreed to a two-week extension. Less than an hour later, before the undersigned had a reasonable opportunity to confer with Possum Kingdom, CBGR filed its request for an extension of its deadline to file prefiled testimony and exhibits, a major deadline in this proceeding.

CBGR did not reasonably confer with Possum Kingdom about its deadline extension request in good faith. According to CBGR's counsel, CBGR had been considering retaining additional counsel since early November, but that decision was not solidified until just this week. That is not Possum Kingdom's fault. CBGR, not Possum Kingdom, initiated this proceeding many months ago.

Notwithstanding the foregoing, Possum Kingdom does not oppose a two-week extension of CBGR's deadline. But CBGR did not propose a revised schedule for this proceeding with its request. Instead, CBGR's request states, "The requested extension does not require amending any other deadlines in the scheduling order."¹ Possum Kingdom disagrees with CBGR on that point. In fairness, all deadlines should be pushed back a minimum of an additional two weeks if CBGR's request is granted. CBGR should be required to file a new procedural schedule that is agreed upon by all parties incorporating these deadline adjustments.

Respectfully submitted,

By: 

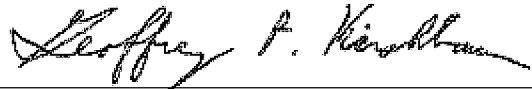
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**ATTORNEYS FOR POSSUM KINGDOM
WATER SUPPLY CORPORATION**

¹ Crystal Bluff Goat Ranches, LLC's Request for Extension to File Prefiled Testimony and Exhibits (Nov. 30, 2022).

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 December 1, 2022, in accordance with the Orders Suspending Rules filed in Project No. 50664.

A handwritten signature in black ink, reading "Geoffrey P. Kirshbaum". The signature is written in a cursive style with a horizontal line underneath it.

Geoffrey P. Kirshbaum