



## Filing Receipt

**Received - 2022-06-09 01:59:02 PM**  
**Control Number - 53515**  
**ItemNumber - 7**

**PUC DOCKET NO. 53515**

<b>PETITION BY MAPLE</b>	<b>§</b>	<b>BEFORE THE</b>
<b>VIEW DEVELOPMENT, LLC</b>	<b>§</b>	
<b>FOR EXPEDITED RELEASE FROM</b>	<b>§</b>	<b>PUBLIC UTILITY COMMISSION</b>
<b>WATER CCN NO. 11982</b>	<b>§</b>	
<b>HELD BY ORBIT SYSTEMS, INC.</b>	<b>§</b>	<b>OF TEXAS</b>

**MAPLE VIEW DEVELOPMENT, LLC'S RESPONSE TO THE COMMISSION STAFF'S RECOMMENDATION ON ADMINISTRATIVE COMPLETENESS**

Maple View Development, LLC (Maple) files this, its Response to the Commission Staff's Recommendation regarding Administrative Completeness. As per Order No. 2, Maple's response is due June 20, 2022, and thus, the Response is timely filed.

The Commission Staff requested that Maple revise the affidavit to correct the acreage total, and to submit revised mapping to resolve mapping deficiencies. The Commission Staff also provided the correct mailing address for Orbit Systems, Inc. Please find attached the following: (1) the revised Affidavit of Itiel Kaplan; (2) revised maps and supporting digital data; and (3) a copy of the return receipt evidencing Orbit Systems, Inc. was mailed a copy of the Petition. Maple respectfully requests that items (1) and (2) replace the affidavit (Petition Exhibit A) and mapping and digital data (Petition Exhibit B) attached to original petition and that these replacement items be considered as part of the petition, that the obligation to provide Orbit Systems with the petition be deemed to be completed, and that the petition be deemed administratively complete.

Respectfully submitted,

Emily W. Rogers  
State Bar No. 24002863  
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Bickerstaff Heath Delgado Acosta LLP  
3711 S. MoPac Expressway  
Building One, Suite 300  
Austin, TX 78746  
Telephone: (512) 472-8021  
Facsimile: (512) 320-5638

BY: Emily W. Rogers  
Emily W. Rogers  
Attorney for Maple View Development, LLC

**CERTIFICATE OF SERVICE**

I certify that a copy of this document was served on all parties of record via email on June 9, 2022, in accordance with the requirements of 16 Tex. Admin. Code § 22.74 and PUC Order No. 2 in Docket No. 50664.

Emily W. Rogers  
Emily W. Rogers

# **Attachment 1**

**PUC DOCKET NO. 53515**

**PETITION BY MAPLE § BEFORE THE  
VIEW DEVELOPMENT, LLC §  
FOR EXPEDITED RELEASE FROM § PUBLIC UTILITY COMMISSION  
WATER CCN NO. 11982 §  
HELD BY ORBIT SYSTEMS, INC. § OF TEXAS**

**AFFIDAVIT IN SUPPORT OF PETITION BY MAPLE VIEW  
DEVELOPMENT, LLC FOR EXPEDITED RELEASE PURSUANT TO TEXAS  
WATER CODE SECTION 13.2541**

STATE OF TEXAS §  
§  
COUNTY OF HARRIS §

BEFORE ME, the undersigned notary, personally appeared Itiel Kaplan, the affiant, a person who is known to me. After administering an oath, the affiant testified that:

1. “My name is Itiel Kaplan. I am over the age of eighteen years, of sound mind, and am capable of making this affidavit. The facts stated in the affidavit are within my personal knowledge and are true and correct.
2. I am the Manager of the Maple X, LLC, which is the manager of Maple View GP LLC, which is the manager of Maple View Holdings LLC, which is the manager of Maple View Development LLC, which is the petitioner in this matter.
3. Maple View Development LLC owns approximately 235.281 acres of land located in Brazoria County, Texas (Property). Exhibit C attached to this Petition is a true and correct copy of the deed demonstrating ownership of the tract.
4. This Property is located within the boundaries of water Certificate of Convenience and Necessity No. 11982 issued to Orbit Systems, Inc. Exhibit B attached to this Petition is a true and correct copy of a map identifying the Property, its location, and the area of the CCN.
5. The Property in question is not receiving water service from Orbit Systems, Inc. or any other water service provider. Petitioner has not requested water service from Orbit Systems, Inc. or paid any fees or charges to initiate or maintain water, and there are no billing records or other documents indicating an existing account for the Property. Petitioner has not entered into written agreement with Orbit Systems, Inc. whereby Orbit Systems, Inc. has made a contractual committed to provide service to the Property, or to construct facilities to serve the Property. There are no Orbit Systems, Inc. facilities located on the Property

6. I request that the Public Utility Commission on Texas release this Property from water CCN No. 11982.”

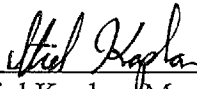
FURTHER AFFIANT SAYETH NOT.

Maple View Development LLC, a Texas limited liability company

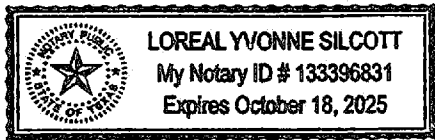
By: Maple View Holdings LLC, a Delaware limited liability company, Its Manager

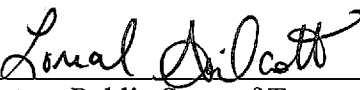
By: Maple View GP LLC, a Delaware limited liability company, Its Manager

By: Maple X, LLC, a Texas limited liability company, Its Manager

  
\_\_\_\_\_  
Itiel Kaplan, Manager

SWORN AND SUBSCRIBED TO BEFORE ME by 24 on  
May, 2022.



  
\_\_\_\_\_  
Notary Public State of Texas

# **Attachment 2**



**Legend**

- Brazoria County Roads
- Tract of Land for Release

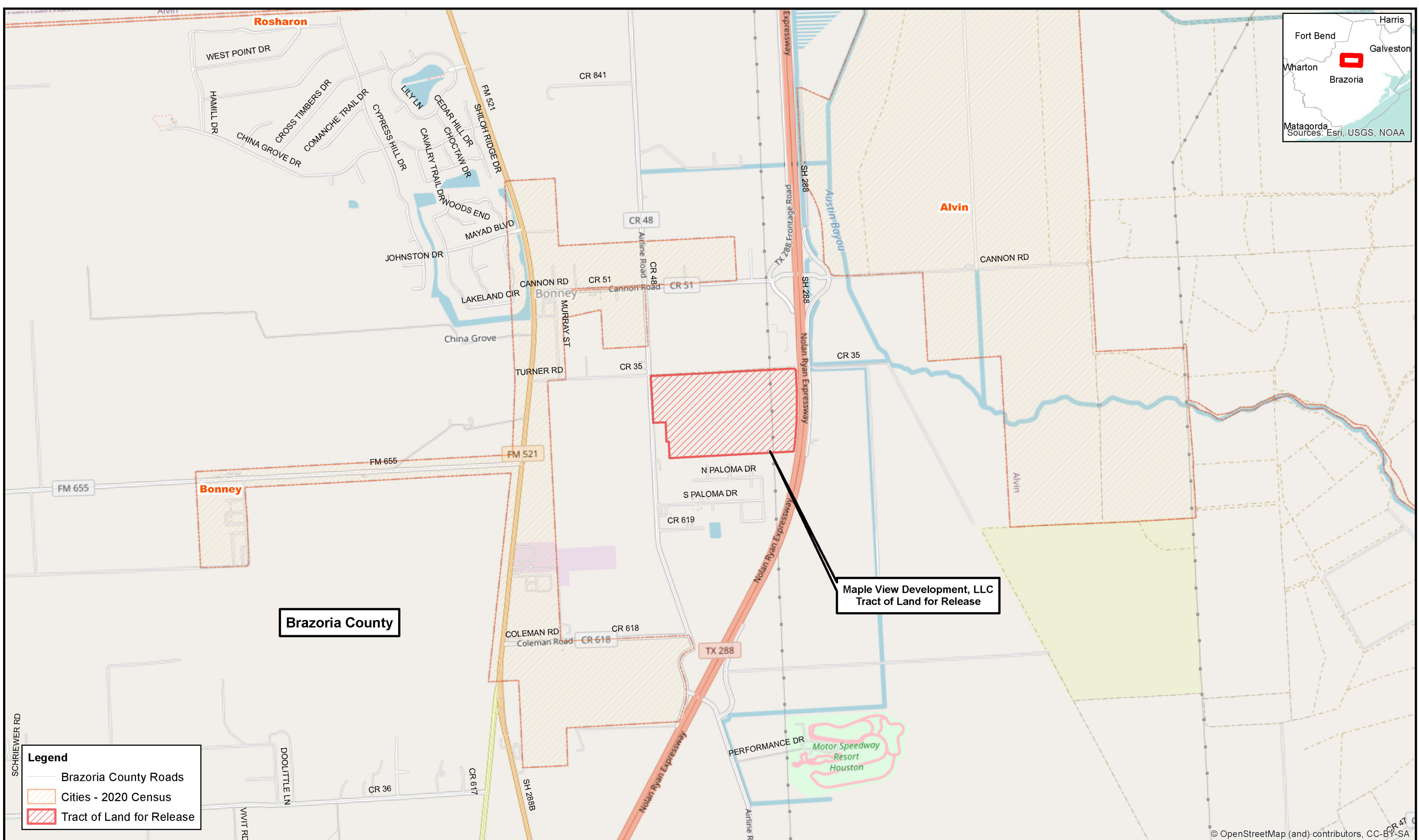
0 0.075 0.15 0.3 Miles

Created Date: 5/25/2022  
ESRI Open Street Map for base map.

**Petition by Maple View Development, LLC for Expedited Release  
from Orbit Systems Inc. CCN No 11982 in Brazoria County, Texas  
DETAIL MAP**

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**Legend**

- Brazoria County Roads
- Cities - 2020 Census
- Tract of Land for Release

0 0.225 0.45 0.9 Miles  
Created Date: 5/25/2022

**Petition by Maple View Development, LLC for Expedited Release from Orbit Systems Inc. CCN No 11982 in Brazoria County, Texas**  
**GENERAL LOCATION MAP**

# **Attachment 3**

Return Receipt (Form 3811) Barcode



9590 9266 9904 2185 4506 92

1. Article Addressed to:

Orbit Systems  
P.O. Box 956  
Rosharon, TX 77583

2. Certified Mail (Form 3800) Article Number

9414 7266 9904 2185 4506 99

**COMPLETE THIS SECTION ON DELIVERY**

A. Signature

X *Peggy Paul*

Agent

Addressee

B. Received by (Printed Name)

C. Date of Delivery

D. Is delivery address different from item 1?  Yes

If YES, enter delivery address below:  No

3. Service Type:

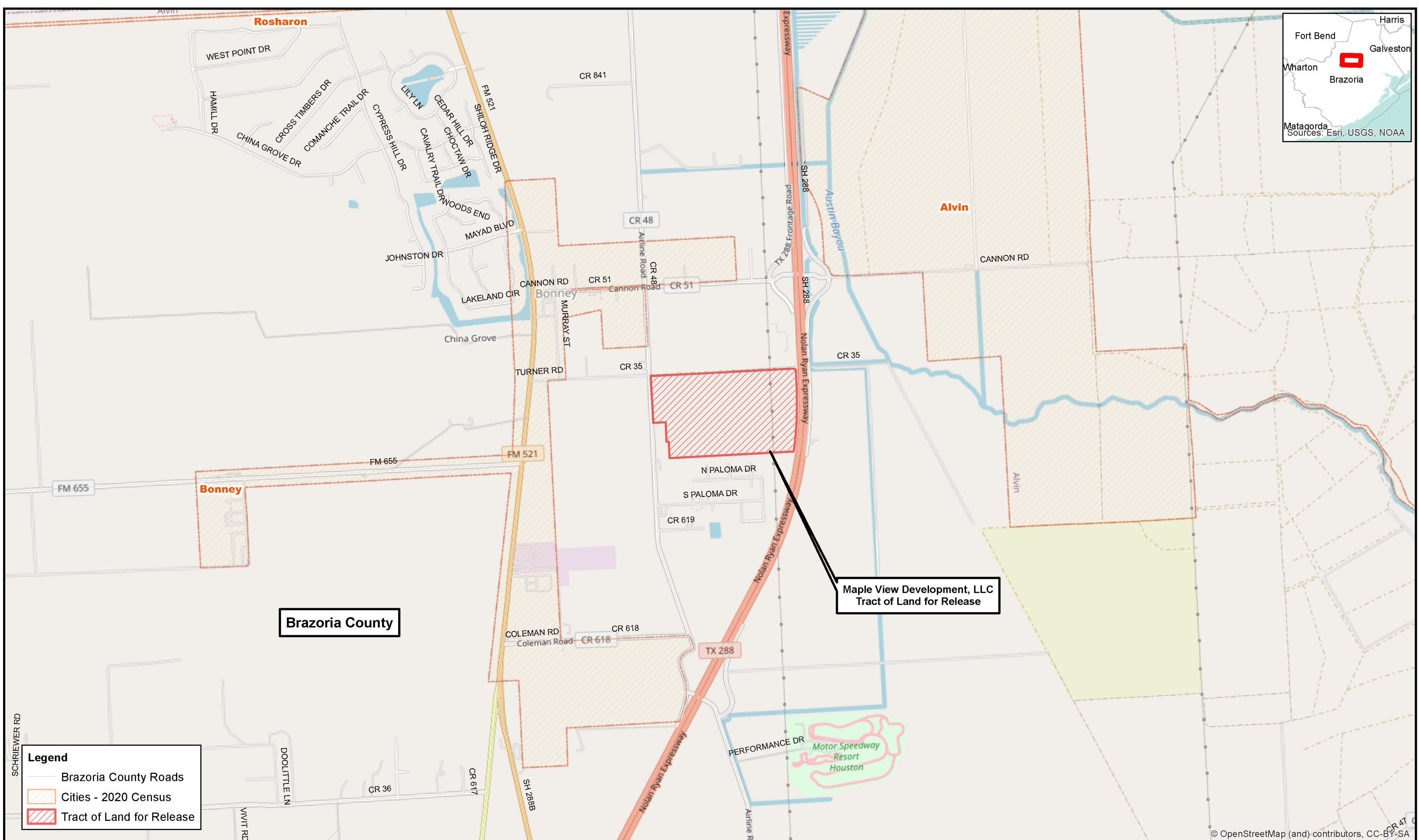
Certified Mail

Reference Information

Reference Information

SW 05/24/2022

RFB



**Legend**

- Brazoria County Roads
- Cities - 2020 Census
- Tract of Land for Release

0 0.225 0.45 0.9 Miles  
Created Date: 5/25/2022

**Petition by Maple View Development, LLC for Expedited Release from Orbit Systems Inc. CCN No 11982 in Brazoria County, Texas**  
**GENERAL LOCATION MAP**

© 2022 Bickerstaff Heath Delgado Acosta LLP  
Data Source: Maple Development Tract obtained from Civil-Surv Land Surveying, L.C.; Houston, Texas  
Background Image: ESRI World Street Map



**Legend**

- Brazoria County Roads
- Tract of Land for Release

0 0.075 0.15 0.3 Miles

Created Date: 5/25/2022  
ESRI Open Street Map for base map.

**Petition by Maple View Development, LLC for Expedited Release  
from Orbit Systems Inc. CCN No 11982 in Brazoria County, Texas  
DETAIL MAP**

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(1).cpg

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(1).dbf

MapleViewDevelopmentLLC\_Whole\_Tract\_OrbitSystems\_April2022\_TSMS  
(1).prj

MapleViewDevelopmentLLC\_Whole\_Tract\_OrbitSystems\_April2022\_TSMS  
(1).sbn

MapleViewDevelopmentLLC\_Whole\_Tract\_OrbitSystems\_April2022\_TSMS  
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MapleViewDevelopmentLLC\_Whole\_Tract\_OrbitSystems\_April2022\_TSMS.dbf

MapleViewDevelopmentLLC\_Whole\_Tract\_OrbitSystems\_April2022\_TSMS.prj

MapleViewDevelopmentLLC\_Whole\_Tract\_OrbitSystems\_April2022\_TSMS.sbn

MapleViewDevelopmentLLC\_Whole\_Tract\_OrbitSystems\_April2022\_TSMS.sbn

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