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PETITION BY ROBERT FEIGER, VICE PRESIDENT OF THE AM BUSINESS TRUST 2021-001, A UTAH REGISTERED TRUST, FOR STREAMLINED EXPEDITED RELEASE FROM WATER CCN NO. 10105, CITY OF GRAND PRAIRE TEXAS

BEFORE THE PUBLIC

UTILITY

COMMISSION OF TEXAS

PETITIONER'S RESPONSE TO COMMISSION STAFF'S REQUEST FOR EXTENSION OF DEADLINE TO FILE ITS FINAL RECOMMENDATION ON PETITIONER'S PETITION FOR STREAMLINED EXPEDITED RELEASE <u>FROM WATER CCN NO. 10105</u>

TO THE PUBLIC UTILITY COMMISSION OF TEXAS:

COMES NOW Robert Feiger, acting in his capacity as Vice President of AM Real Estate Solutions, Inc, Trustee of the AM Business Trust 2021-001, a Utah Registered Trust (the "Trust") and, on behalf of the Trust ("Petitioner"), and files this Response to the Commission Staff's Request for an Extension to File Staff's Final Recommendation on Petitioner's Petition for Streamlined Expedited Release from Water Certificate of Convenience and Necessity ("CNN") No. 10105; and in support thereof would show the Commission as follows:

I. <u>PETITIONER'S RESPONSE TO STAFF'S REQUESTED EXTENSION</u>

Petitioner has no objection to the Administrative Law Judge ("ALJ") granting the Commission Staff's October 28, 2022, request for an extension of time until November 2, 2022, to file Staff's Final Recommendation on the pending Petition

II. CONCLUSION

Petitioner supports the ALJ's issuing the Commission Staff's request for an Order granting the extension to November 4, 2022.

Respectfully submitted,

MCCARTHY & MCCARTHY, LLP 1122 Colorado St., Suite 2399 Austin, Texas 78701

By: /s/ Edmond R. McCarthy, Jr. Edmond R. McCarthy, Jr. State Bar No. 13367200 (512) 904-2313 (Tel) (512) 692-2826 (Fax) ed@ermlawfirm.com

ATTORNEYS FOR PETITIONER, AM BUSINESS TRUST 2021-001, a Utah Registered Trust, acting by and through its Trustee, AM Real Estate Solutions, Inc.

CERTIFICATE OF SERVICE

I hereby certify by my signature below, that on this the 31st day of October, 2022, a true

and correct copy of the foregoing Response to the Commission Staff's requested extension of its

filing deadline to November 2nd was:

- (i) electronically e-filed with the Commission pursuant to Rule 22.74 and the Commission's Order in Docket No. 50664 addressing Covid-19 Pandemic conditions; and
- (ii) sent via e-mail to Counsel of Record in this Docket No. 53698.

/s/ Edmond R. McCarthy, Jr. Edmond R. McCarthy, Jr.

SERVICE LIST

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Representing Public Utility Commission of Texas – Legal Division