



Filing Receipt

Received - 2022-11-22 02:24:59 PM

Control Number - 53698

ItemNumber - 21

PUC DOCKET NO. 53698

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

**PETITIONER’S RESPONSE TO THE PROPOSED ORDER GRANTING
PETITIONER’S PETITION FOR STREAMLINED EXPEDITED RELEASE
FROM WATER CCN NO. 10105**

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 Proposed Order Granting 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.
PETITIONER’S RESPONSE**

Petitioner has no corrections or exceptions to the proposed Order Granting Petitioner’s Petition for Streamlined Expedited Release from Water Certificate of Convenience and Necessity ("CNN") No. 10105.

**II.
CONCLUSION**

Accordingly, the Petitioner requests the proposed Order be granted in this Docket No. 53698.

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 22nd day of November 2022, a true and correct copy of the foregoing Response to the Proposed Order in Docket No. 53698 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

Michael A. Gershon
Lloyd Gosselink Rochelle & Townsend,
P.C.
816 Congress Avenue, Suite 1900
Austin, Texas 78701
Tel.: (512) 322-5872
Fax: (512) 472-0532
E-mail: mgershon@lglawfirm.com

Representing City of Grand Prairie

Legal Division
Attn: Ian Groetsch
Public Utility Commission of Texas
P.O. Box 13326
Austin, Texas 78711
Tel.: (512) 936-7465
Fax: (512) 936-7268
E-mail: ian.groetsch@puc.texas.gov

Representing Public Utility Commission of Texas – Legal
Division

Central Records Division
Public Utility Commission of Texas
P.O. Box 13326
Austin, Texas 78711

Danielle Jouenne, Esquire
Senior Counsel
Aqua
762 W. Lancaster Avenue
Bryn Mawr, PA 19010
Tel.: 610.520.6339
E-mail: DJouenne@essential.co

Representing Aqua Texas, Inc., Petitioner's Alternate
Retail Water Utility