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Received - 2022-12-02 04:35:17 PM
Control Number - 53698
ItemNumber - 23

DOCKET NO. 53698

PETITION OF AM BUSINESS	§	
TRUST 2021-001, A FOREIGN	§	
TRUST BASED IN UTAH	§	BEFORE THE
REGISTERED TO DO BUSINESS	§	
IN TEXAS, TO AMEND CITY OF	§	PUBLIC UTILITY COMMISSION
GRAND PRAIRIE’S WATER	§	
CERTIFICATE OF CONVENIENCE	§	OF TEXAS
AND NECESSITY NO. 10105 IN	§	
ELLIS COUNTY BY	§	
STREAMLINED EXPEDITED	§	
RELEASE	§	

**PETITIONER AM BUSINESS TRUST 2021-001 AND
RESPONDENT CITY OF GRAND PRAIRIE’S
UNOPPOSED JOINT REQUEST TO ABATE**

Petitioner AM Business Trust 2021-001 and Respondent CCN holder City of Grand Prairie (the “Parties”) request (i) abatement of this proceeding and (ii) that the proposed order not be placed on the Commissioners’ agenda so as to allow for settlement discussions and, in support of this request, respectfully show as follows:

**Request for Abatement and
Request that This Docket Not Be Placed on Commissioners’ Agenda**

The petition was filed on June 8, 2022, and declared administratively complete on September 8, 2022. Subsequently, after two extensions requested by Commission staff for good cause, several filings by the Parties and Commission Staff, issuance of a proposed order, and the filing of exceptions, a revised proposed order was filed on December 1, 2022.

The Parties have a genuine interest in exploring settlement to resolve this matter amicably and without further burdening the Commission. Granting this request achieves the conservation of public resources, efficient resolution of this docket, and is in the best interest of the Parties who desire an opportunity to pursue mutually beneficial resolution, and not for delay. This is the first request for any type of abatement by the Parties.

Petitioner is aware of the statutory timeframe contemplated by the expedited release process, and but believes the potential for an agreed settlement merits a limited waiver of the rights associated with that timeframe for the abatement period proposed. Petitioner is

committed to the proposition that the requested abatement be granted so that justice may be served, and not for delay.

The Parties believe that, in light of the fact that the final order has not yet been set for consideration at an upcoming Commission Open Meeting, coupled with timing of the upcoming holidays, that 60 calendar days should be sufficient to allow for settlement discussions and an opportunity to resolve this matter. The Parties propose filing a joint settlement status report not later than Monday, February 6, 2023.

The Parties have communicated with Commission Staff who is not opposed to the requested abatement.

PRAYER

WHEREFORE, PREMISES CONSIDERED, Petitioner AM Business Trust 2021-001 and Respondent CCN holder City of Grand Prairie respectfully pray that this joint request be granted, that this docket not be set on a Commissioners' agenda prior to mid-February 2023, and that the Parties be required to file a settlement status report not later than February 6, 2023.

Respectfully submitted,

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/s/ Edmond R. McCarthy, Jr.

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ATTORNEYS FOR AM BUSINESS
TRUST 2021-001, a Utah-Registered
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ATTORNEYS FOR CITY OF
GRAND PRAIRIE

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 2, 2022, in accordance with the Order Suspending Rules, issued in Docket No. 50664, and the order of the Administrative Law Judge.

/s/ Michael A. Gershon

Michael A. Gershon