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APPLICATION OF CRYSTAL SYSTEMS	§	PUBLIC UTILITY COMMISSION
TEXAS, LLC, AND UNDINE TEXAS, LLC,	§	
FOR SALE, TRANSFER, OR MERGER OF	§	OF TEXAS
FACILITIES AND CERTIFICATE	§	
RIGHTS IN SMITH COUNTY	§	

APPLICANT’S RESPONSE TO STAFF’S REQUEST FOR EXTENSION

On October 18, 2022, Commission Staff requested an extension of its October 18th deadline to file a supplemental recommendation regarding the administrative completeness of the application. Undine Texas, LLC (“Undine”) objects to the request.


Staff’s request seeks the extension “due to the subject matter expert’s conflict with a previously scheduled conference.” This is now the fourth extension Staff has requested in an Undine or Undine-affiliated application over the past several days, each asserting the same basis for the request. While Undine is sympathetic to staffing limitations, the request for a three-week extension across four dockets (to date) without applicant consultation and submitted on the day of the deadline, on the basis that a subject matter expert has a conference somewhere within that three-week period, is problematic for an applicant and counter-party that are seeking to move forward with a transaction in a predictable manner. The basis offered by Staff, the limited statement that a subject matter expert has a conference, does not establish good cause as required under 16 Tex. Admin. Code § 22.4(b).

Prayer

The Applicant requests that the Staff’s request for extension be denied or, in the alternative, that the length of the extension be limited to a maximum of ten days.

Respectfully submitted,

Gregg Law PC

A handwritten signature in black ink, appearing to read 'P. T. Gregg', is written over a horizontal line.

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CERTIFICATE OF SERVICE

By my signature above, I certify that on October 18, 2022 the foregoing document was served via first class mail and/or email to counsel of record in the matter.