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APPLICATION OF TEXAS WATER UTILITIES, L.P. AND CREEK WATER UTILITY, LLC FOR SALE, TRANSFER, OR MERGER OF FACILITIES AND CERTIFICATE RIGHTS IN MARION COUNTY	§ § § § § §	PUBLIC UTILITY COMMISSION OF TEXAS
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TEXAS WATER UTILITIES, L.P.'S RESPONSE TO COMMISSION STAFF'S REQUEST FOR EXTENSION

Texas Water Utilities, L.P. (TWU) files this Response to Public Utility Commission of Texas (Commission) Staff's Request for Extension, filed on January 18, 2023.

I. PROCEDURAL HISTORY

On August 1, 2022, TWU and Creek Water Utility, LLC filed their application for sale, transfer, or merger of facilities and certificate rights in Marion County, Texas. On January 10, 2023, the Commission administrative law judge (ALJ) issued Order No. 8 Establishing Procedural Schedule, which set the deadline for Commission Staff to request a hearing or file a recommendation on approval of the sale and the certificate of convenience and necessity (CCN) amendment to January 18, 2023. On January 18, 2023, Commission Staff filed a request for a one-month extension of said deadline and all subsequent deadlines.

II. RESPONSE

On January 18, 2023, Commission Staff sent an e-mail to TWU's attorneys, requesting TWU to confirm its agreement to extend Commission Staff's deadline, due on the same day. Unfortunately, TWU was unable to respond to Commission Staff before they filed their request for extension. The request for extension reads as a request to extend the March 20, 2023 deadline for the Commission to approve the sale or required a hearing, which corresponds to the 120-day statutory deadline set in Texas Water Code (TWC) § 13.301(e) and (f), and requires TWU's consent to be extended. TWU therefore respectfully requests that Commission Staff's extension request be limited to two weeks, until February 1, 2023, should the ALJ grant Commission Staff's request to extend their deadline to request a hearing or file a recommendation on approval of the sale and the certificate of CCN amendment in order to retain

the 120-day statutory deadline for approval of the sale set in Order No. 8.¹ TWU conferred with Commission Staff who continues to request an extension of one month for its recommendation on approval of sale and the CCN.

III. CONCLUSION

TWU respectfully requests that, in order to retain the 120-day statutory deadline for approval of the sale set in Order No. 8, Commission Staff's extension request be limited to two weeks—until February 1, 2023—should the ALJ grant Commission Staff's request to extend their deadline to request a hearing or file a recommendation on approval of the sale and the CCN amendment. Additionally, TWU requests any further relief to which it have shown itself justly entitled.

Respectfully submitted,

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**ATTORNEYS FOR TEXAS WATER
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¹ Although Commission Staff filed its First Set of Requests for Information on January 18, 2023, TWU will endeavor to respond to Commission Staff's RFIs by January 27, 2023.

CERTIFICATE OF SERVICE

I hereby 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 January 19, 2023, in accordance with the Order Suspending Rules, issued in Project No. 50664.

/s/ William A. Faulk, III

WILLIAM A. FAULK, III