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APPLICATION OF FOREST GLEN	§	PUBLIC UTILITY COMMISSION
UTILITY COMPANY TO AMEND ITS	§	
CERTIFICATE OF CONVENIENCE	§	OF TEXAS
AND NECESSITY IN MEDINA	§	
COUNTY, TEXAS	§	

JOINT REQUEST FOR EXTENTION

COMES NOW Staff of the Public Utility Commission of Texas (Commission) and Forest Glen Utility Company (Applicant or Forest Glen) (collectively, the Parties) and file this Joint Request for Extension. In support thereof, the Parties would show the following:

I. BACKGROUND

On December 16, 2022, Forest Glen filed an application to amend its sewer certificate of convenience and necessity (CCN) No. 21070 in Medina County. On October 23, 2023, Commission Staff filed their First Request for Information (RFIs) seeking certain information from Applicant by November 13, 2023. On November 7, 2023, the Commission Administrative Law Judge (ALJ) issued Order No. 10 entering a procedural schedule, including a deadline for Commission Staff to file final maps, certificates, and tariffs as applicable by November 16, 2023. Therefore this pleading is timely filed.

II. MOTION FOR EXTENSION

Commission Staff's RFIs imposed a 20-day deadline on Applicant to provide certain financial information before their final map, certificate and tariff are otherwise due, one week later. However, the RFIs required the collection of certain documentation from Applicant's affiliate for which Applicant needs additional time. Commission Staff was unopposed to Applicant's request for additional time for this purpose. However, delaying the deadline for RFIs would force Commission Staff to miss its deadline to provide final documents under the Order No. 10 schedule. In other words, the RFI delay, in turn, triggers the need for an extension to the other remaining dates in Order No. 10.

Therefore, in accordance with title 16 Tex. Admin. Code § 22.4(b), in order for Applicant to obtain and Commission Staff to thoroughly review the requested discovery, the Parties propose an extension to all remaining deadlines in the Order No. 10 schedule as follows:

Event	Deadline
Deadline for Forest Glen to respond to Staff's RFI	December 11, 2023
Deadline for Commission Staff to file final maps, certificates, and tariffs	December 18, 2023
Deadline for applicant to respond to Commission Staff's recommendation on final disposition	December 29, 2023
Deadline for Commission Staff's recommendation on final disposition	January 5, 2024
Deadline for parties to submit proposed findings of fact, conclusions of law, and ordering paragraphs	January 19, 2024

III. PRAYER

WHEREFORE, PREMISES CONSIDERED, the Parties respectfully pray that the Commission ALJ extend the procedural schedule consistent with this pleading.

Respectfully submitted,


PUBLIC UTILITY COMMISSION OF TEXAS LEGAL DIVISION

Marisa Wagley Lopez
Division Director

John York Harrison
Senior Managing Attorney

/s/ Cheri Hasz
Cheri Hasz
State Bar No. 24126575
1701 N. Congress Avenue
P.O. Box 13326
Austin, Texas 78711-3326
(512) 936-7343
(512) 936-7268 (facsimile)
Cheri.Hasz@puc.texas.gov

Randall B. Wilburn
State Bar No. 24033342
Helen S. Gilbert
State Bar No. 00786263
BARTON BENSON JONES PLLC
7000 N. MoPac Expwy, Suite 200
Austin, Texas 78731
Telephone: (210) 640-9174
Telecopier: (210) 600-9796
hgilbert@bartonbensonjones.com

By: 
Helen S. Gilbert

**ATTORNEYS FOR FOREST GLEN UTILITY
COMPANY**

CERTIFICATE OF SERVICE

I certify that, unless otherwise ordered by the presiding officer, notice of the filing of this document will be provided to all parties of record via electronic mail on November 14, 2023, in accordance with the Second Order Suspending Rules, filed in Project No. 50664.


Helen S. Gilbert