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DOCKET NO. 56589

PETITION BY RESIDENTS OF GRAND § BEFORE THE
LAKES MUNICIPAL UTILITY DISTRICT §
NO. 2 APPEALING THE WATER RATES § PUBLIC UTILITY COMMISSION
ESTABLISHED BY THE DISTRICT'S §
BOARD OF DIRECTORS § OF TEXAS

MOTION TO STAY ORDER NO. 3, FILED PURSUANT TO 16 TAC § 22.123(a)(5)

(1) Reference is made to Order No. 3 [56589-20], our pleading [56589-23], Order No. 4 [56589-31], and our appeal [56589-32].

(2) 16 Texas Administrative Code (TAC) § 22.123(a)(5) 'Motion to stay' reads:

Pending a ruling by the commissioners, the presiding officer may, upon motion, grant a stay of the interim order. A motion for a stay shall specify the basis for a stay. Good cause shall be shown for granting a stay. The mere filing of an appeal shall not stay the interim order or the procedural schedule.

PRAYER

(3) Pending a ruling on our appeal [56589-32], the Commission is respectfully asked to grant a stay of Order No. 3 [56589-20]. The basis for a stay is detailed in the appeal [56589-32], which is incorporated by reference as if fully set forth herein. Good cause for granting a stay is shown in the appeal [56589-32]. The Commission's requirement in Order No. 3 alleged to be based on 16 TAC § 22.101(a) is unlawful, unjustified, flawed, and arbitrary. The first two sentences of 16 TAC § 22.101(a) are inapplicable to the instant case (docket no. 56589) and the third sentence of the provision is already met.

Katy, Texas on the 23rd day of May 2024.

Respectfully submitted,

on behalf of Grand Lakes MUD No. 2 ratepayers

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CERTIFICATE OF SERVICE

I, George J. Wakileh, certify that notice of the filing of this pleading is being provided to all parties of record via electronic mail on May 23, 2024.



George J. Wakileh, Ph.D.