
From: Paul Robbins <paul_robbins@greenbuilder.com>
Sent: Friday, June 17, 2022 12:26 PM
To: Rate Fillings 2022
Cc: Alaina Zermeno (alaina.zermeno@huschblackwell.com); Alise Porto; Andy Perny (andy.perny@austintexas.gov); Anthony Gausepohl (a.gausepohl@samsung.com); Ashley Fisher; Benjamin B. Hallmark (bhallmark@omm.com); Cathy Works (cathy.works@ni.com); Chris Reeder (chris.reeder@huschblackwell.com); Christopher Hughes (chris.hughes@huschblackwell.com); Clarence Johnson (cjenergyconsult@att.net); Dru Spiller (dru.spiller@sierraclub.org); Ed Latson (ed@arma-tx.org); Eric Goff (eric@ericwintersgoff.com); Hanna Mitchell (hmitchell@solarunitedneighbors.org); Hayden Baggett (hbaggett@3pointpartners.com); John Hubbard (jhubbard@omm.com); Joshua Smith (joshua.smith@sierraclub.org); Katie Coleman (kcoleman@omm.com); Lanetta Cooper - Texas Ratepayers' Organization to Save Energy (cooperlmcooper@outlook.com); Lynnel Reyes (lreyes@switch.com); Maria Faconti (maria.faconti@huschblackwell.com); Matthew E. Miller (matthew.miller@sierraclub.org); OMM E-Service (ommeservice@omm.com); Roger Borgelt (roger@borgeltlaw.com); Stacie Bennett (slbennett@balch.com); Taylor Denison; Thomas Brocato; Todd F. Kimbrough - Balch & Bingham (tkimbrough@balch.com); Trey Salinas (tsalinas@3pointpartners.com); Victor Martinez (pistorin@gmail.com); Patricia Martinez
Subject: Request for Position Statement Deadline Extension

*** External email - Exercise caution ***

To the Impartial Hearing Examiner:

As a participant in the Austin Energy rate case, I am requesting an extension of time to file my Position Statement.

I have two discovery requests that have not been fulfilled by Austin Energy. The holiday weekend is approaching, meaning that I will have little effective time to integrate the information that is provided to me by the deadline of June 22, even if I am sent this information this afternoon. *In fact, I actually have no idea when this information will be provided.*

I have attempted to resolve this situation by asking Austin Energy for an extension. The utility is unrelenting. Its position is that I should have submitted the discovery sooner.

Given that I am working on this case pro bono, I filed my requests as I had time and by the deadline. It is not my responsibility to deliver information to effectively meet the Position Statement deadline. If providing discovery answers in a timely manner was not in Austin Energy's abilities, it should not have established June 22 as the deadline.

I request an extension that will allow adequate time. Specifically, I am asking for 5 working days from the time that my discovery information is delivered to consider that my Position Statement is timely filed.

Sincerely,

Paul Robbins