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**Sent:** Friday, June 17, 2022 3:30 PM  
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**Subject:** Motion for Position Statement Deadline Extension  
**Follow Up Flag:** Follow up  
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Being inexperienced in procedure on this rate case, it is possible that I worded it incorrectly.

I am resending this as a Motion instead of as a Request.

Apologies.

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To the Impartial Hearing Examiner:

As a participant in the Austin Energy rate case, I am filing this Motion for Position Statement Deadline Extension.

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.

The requested extension 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