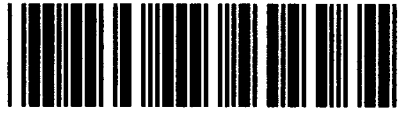




Control Number: 38727



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Addendum StartPage: 0

DOCKET NO. 38727

**APPLICATION OF BROWNSVILLE §
PUBLIC UTILITIES BOARD FOR AN §
AMENDMENT TO A CERTIFICATE OF §
CONVENIENCE AND NECESSITY FOR §
SERVICE AREA BOUNDARIES §
WITHIN CAMERON COUNTY §
(BROWNSVILLE ISD) §**

**PUBLIC UTILITY COMMISSION
OF TEXAS**

**RECEIVED
NOV 8 PM 1:53
PUBLIC UTILITY COMMISSION
FILING CLERK**

**COMMISSION STAFF’S COMMENTS ON SUFFICIENCY
OF APPLICATION AND NOTICE**

The Staff (Staff) of the Public Utility Commission of Texas (Commission) files these comments on sufficiency and notice regarding the September 24, 2010, filing by Brownsville Public Utilities Board (BPUB or Applicant) for a service boundary change within Cameron County.

PURA/Substantive Rule Requirements

PURA §37.053 requires the applicants to submit an application to obtain or amend a CCN. P.U.C. SUBST. R. 25.101(b)(1) requires a certificate or certificate amendment for a change in service area. The factors to consider in granting a certificate, as well as the requirements for granting amendments to a CCN, are outlined in PURA § 37.056 and P.U.C. SUBST. R. 25.101(b).

Staff Comments on Sufficiency

Applicants have provided all information required by the application. Staff finds the application to be sufficient and complete as filed.

Staff Comments on Notice

P.U.C. PROC. R. 22.52 does not require customer notice in minor boundary change proceedings such as this. Accordingly, Staff finds no additional notice (beyond *Texas Register* notice) is required.

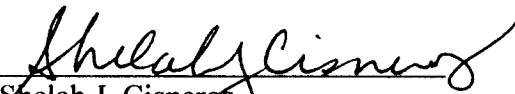
Staff respectfully requests that an order be issued consistent with these comments.

Dated: October 8, 2010

Respectfully Submitted,

Thomas S. Hunter
Division Director
Legal Division

Keith Rogas
Deputy Division Director
Legal Division


Shelah J. Cisneros
Attorney-Legal Division
State Bar No. 24045661
(512) 936-7265
(512) 936-7268 (facsimile)
Public Utility Commission of Texas
1701 N. Congress Avenue
P.O. Box 13326
Austin, Texas 78711-3326

CERTIFICATE OF SERVICE

I certify that a copy of this document will be served on all parties of record on October 8, 2010, in accordance with P.U.C. Procedural Rule 22.74.


Shelah J. Cisneros