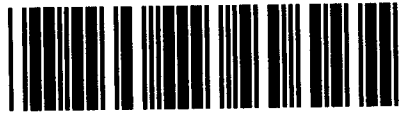


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DOCKET NO. 39342

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PUBLIC UTILITY COMMISSION
FILING CLERK

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

PUBLIC UTILITY COMMISSION
OF TEXAS

**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 April 20, 2011, filing by Brownsville Public Utilities Board (BPUB) for a service area boundary within Gonzales 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

Applicant has 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.

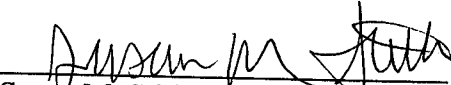
Dated: May 5, 2011

Respectfully Submitted,

Margaret Uhlig Pemberton
Division Director
Legal Division

Keith Rogas
Deputy Division Director
Legal Division

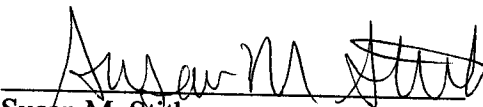
Robert M. Long
Managing Attorney
Legal Division



Susan M. Stith
State Bar No. 24014269
Attorney-Legal Division
(512) 936-7275 (telephone)
(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 May 5, 2011, in accordance with P.U.C. Procedural Rule 22.74.



Susan M. Stith