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PUBLIC UTILITY COMMISSION
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APPLICATION OF GREEN VALLEY § PUBLIC UTILITY COMMISSION
SPECIAL UTILITY DISTRICT AND §
CITY OF SCHERTZ FOR SALE, §
TRANSFER OR MERGER OF § OF TEXAS
CERTIFICATE RIGHTS IN §
GUADALUPE COUNTY (37949-C) §

GREEN VALLEY SPECIAL UTILITY DISTRICT'S RESPONSE TO ORDER NO. 2

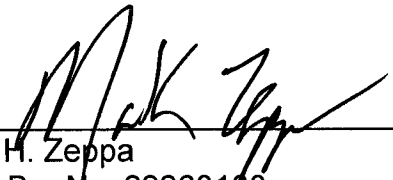
COMES NOW Green Valley Speciation Utility District (GVSUD) and files its response to Order No. 2. GVSUD respectfully submits that a Water Code §13.248 contract between two or more CCN holders, when approved by the Commission, effectuates a CCN amendment exactly like a Water Code § 13.241 CCN Application §13.301 Sale, Transfer or Merger Application. This is because CCNs are created by Commission order but are identified and expressed to the public via master maps maintained by the agency. Whether a service area is amended by a §13.241 application, a §13.301 application or a §13.248 contract, the Commission's orders will be recorded on the same maps by the same agency staff members. Only after this is done will the applicants and the public know exactly where the new CCN boundaries are. This is what GVSUD believes was meant by the Legislature's use of the term, "incorporated into the appropriate areas of public convenience and necessity." If this were not the case, one would expect the Legislature to have created a second system of recording CCN boundaries. It did not.

This interpretation and application of §13.248 agreements has long been followed by the PUC's predecessor agencies. Two recent examples are: (1) SOAH Docket No.

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582-11-1313; TCEQ Docket No. 2010-1636-UCR; *Application of City of Denton for Single Certification under Water Code §13.255* and TCEQ Docket No. 2011-0574-UCR; SOAH Docket No. 582-11-5773; *In Re: §13.255 Petition of City of Montgomery and Dobbins-Plantersville WSC.*

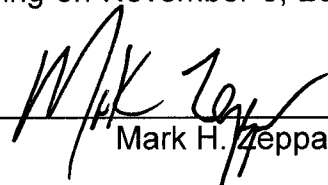
Respectfully submitted,

By: 
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ATTORNEY FOR GREEN VALLEY SPECIAL
UTILITY DISTRICT

CERTIFICATE OF SERVICE

I, Mark H. Zeppa, Attorney for the Applicant, certify that a copy of this document was served on all parties of record in this proceeding on November 3, 2014 in the following manner: electronic facsimile transmission.


Mark H. Zeppa