

Control Number: 43253



Item Number: 17

Addendum StartPage: 0

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APPLICATION OF THE CITY OF SCHERTZ TO AMEND ITS SEWER CERTIFICATE OF CONVENIENCE NECESSITY IN BEXAR COUNTY (37913-C)	§ § § § §	2015 MAR -6 PM 1:42 PUBLIC UTILITY COMMISSION PUBLIC UTILITY COMMISSION FILING CLERK OF TEXAS
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**COMMISSION STAFF'S RESPONSE TO ORDER NO. 7 AND REQUEST FOR
EXTENSION OF TIME**

COMES NOW the Staff of the Public Utility Commission of Texas (Staff), representing the public interest, and files this Response to Order No. 7 and would show the following:

I. BACKGROUND

On May 9, 2014, the City of Schertz, Texas (the City) filed an application to amend its sewer certificate of convenience and necessity (CCN) No. 20271 in Bexar County, Texas with the Texas Commission on Environmental Quality (TCEQ). The City requests to amend its CCN by obtaining the sewer CCN that is currently held by the San Antonio River Authority (SARA). SARA, which has the sole CCN for this area, only requires the Wholesale or Treatment CCN and has agreed to allow the City to request the Retail or Collection CCN for this area within the City's corporate limits.

On September 1, 2014 the economic regulation of water and wastewater utilities was transferred from the TCEQ to the Public Utility Commission of Texas (PUC or Commission). On September 24, 2014, the Commission issued Order No. 2, requiring Commission Staff to file comments on the administrative completeness of the City's application. On October 8, 2014, Commission Staff filed its response identifying certain deficiencies with the City's application. On October 9, 2014, the Commission issued Order No. 3 which found the application deficient and ordered the applicant to cure the noted deficiencies. Subsequently on November 25, 2014, the City requested an extension to allow it greater time to cure the noted deficiencies. Order No. 4 granted this extension. On January 30, 2015, the City filed its Response to Order No. 4 and Request for Extension for Application Deficiencies where the City noted that though it has submitted information it believes cures two of the stated deficiencies, the City would like additional time to cure the remaining deficiencies noted in Staff's October 8, 2014 response. On January 30, 2015, Order No. 5 was issued directing Staff to respond to the City's requested extension by February 10, 2015. On February 25, 2015, the City filed a response to Order 5 and

17

sought an extension of its deadline to provide a final, approved copy of the Interlocal Agreement to the Commission and asked for clarification of the deficiencies in the application. On February 27, 2015 the ALJ issued Order No. 7 directing staff to file a response to the City's request for clarification by March 6, 2015. Therefore, this pleading is timely filed.

II. REQUEST FOR EXTENSION

Due to the recent transition of water utility cases to the Commission, Staff requests more time in order to provide clarification on the application's deficiencies. Currently the Commission's Water Division has a limited number of people who can review the mapping for these types of applications and this mapping is currently what needs to be clarified. At this time, because Staff received the request for clarification on February 25, 2015, which included additional information, Staff respectfully requests additional time to conduct a full review in order to provide a comprehensive description of the remaining deficiencies in order to provide the Applicant with clarification. Therefore, Staff respectfully requests the deadline for clarification be extended by one week, to March 13, 2015.


III. CONCLUSION

Staff respectfully requests that the ALJ extend the deadline for Staff to file a response to Order No. 7 which will clarify the application's remaining deficiencies to March 13, 2015.

Respectfully Submitted,

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DATED: March 6, 2015

DOCKET NO. 43253
CERTIFICATE OF SERVICE

I certify that a copy of this document will be served on all parties of record on this the 6th of March, 2015, in accordance with P.U.C. Procedural Rule 22.74.

Maria Faconti
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