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**DOCKET NO. 43253**

**APPLICATION OF THE CITY OF  
SCHERTZ TO AMEND ITS SEWER  
CERTIFICATE OF CONVENIENCE AND  
NECESSITY IN BEXAR COUNTY (37913-  
C)**

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§

**PUBLIC UTILITY COMMISSION  
OF TEXAS**  
2015 NOV 19 AM 10:54  
FILING CLERK

**COMMISSION STAFF'S RESPONSE TO ORDER NO. 12 AND REQUEST FOR AN  
EXTENSION**

**COMES NOW** the Staff of the Public Utility Commission of Texas (Staff), representing the public interest, and files this Commission Staff's Response to Order No. 12 and Request for an Extension. In support thereof, Staff shows the following:

**I. BACKGROUND**

On May 9, 2014, the City of Schertz (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 dual certification for the proposed area, which is currently held by the San Antonio River Authority (SARA). On September 1, 2014, the economic regulation of water and wastewater utilities was transferred from the TCEQ to the Public Utility Commission of Texas (Commission).

In Order No. 12, issued October 14, 2015, the Commission administrative law judge (ALJ) ordered Staff to file a recommendation on the amended application or request a new procedural schedule by November 19, 2015.

**II. REQUEST FOR EXTENSION**

Pursuant to 16 Tex. Admin. Code (TAC) § 22.4(b), Staff may request that the time allowed for filing any documents be extended for good cause. Staff has discovered several inconsistencies in the maps provided with the City's application, predominantly related to overlapping boundaries between districts and service areas. Staff intends to meet with the City to address these mapping issues and will require additional time to review anticipated changes prior to submitting its final recommendation. Therefore, Staff requests that the ALJ find good cause to extend Staff's deadline to file a recommendation to December 15, 2015. Staff has communicated with the City and is authorized to represent that the City does not oppose Staff's request for an extension.

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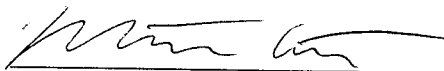
### III. CONCLUSION

For the reasons stated above, Staff respectfully requests the entry of an order extending Staff's deadline to file a recommendation on the amended application or to request a new procedural schedule to December 15, 2015.

Respectfully Submitted,

Margaret Uhlig Pemberton  
Division Director  
Legal Division

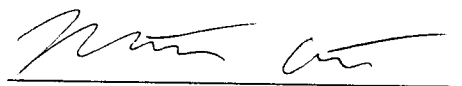
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**DOCKET NO. 43253**  
**CERTIFICATE OF SERVICE**

I certify that a copy of this document will be served on all parties of record November 18, 2015, in accordance with 16 TAC § 22.74.

  
Matthew Arth