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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)	§ § § § §	PUBLIC UTILITY COMMISSION 2016 MAR -7 A.M. 12 OF TEXAS PUBLIC UTILITY COMMISSION FILING CLERK
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COMMISSION STAFF'S MOTION FOR EXTENSION

COMES NOW the Staff of the Public Utility Commission of Texas (Staff), representing the public interest and files this Motion for Extension and would show the following:

I. Motion for Extension

In Staff's proposed amended procedural schedule contained in *Staff's Amended Response to Order No. 13* filed December 18, 2015, Staff noted that it anticipated the City of Schertz's (Schertz) responses to Staff's First Request for Information (RFI) to include updated map data. Schertz filed its *Response to Commission Staff's 1st RFI* on December 28, 2015 and subsequently filed the associated supplemental *Mapping CD* on January 11, 2016. Staff reviewed the maps submitted and identified continuing boundary overlaps. Staff communicated this to Schertz, and Schertz submitted revised maps filed as *Mapping Revisions* on February 4, 2016. There were continuing overlaps in these revised maps however, and after further discussions with Staff, Schertz filed further revisions to its maps on March 4, 2016.

Because this process was delayed by the rounds of revisions required to Schertz's maps, Staff can no longer achieve the March 9, 2016 final recommendation deadline. Staff will need time to review the most recent digital map data submission and will subsequently file a recommendation on its sufficiency. Also, as explained in *Staff's Amended Response to Order No. 13*, Staff will require up to thirty days to complete final mapping and then up to two weeks to obtain consents from Schertz regarding those finalized maps. To allow sufficient time to review this most recent filing, create final maps, and obtain such consents, Staff respectfully requests that the following revised procedural schedule be adopted:

Events:	Dates:
Deadline for Commission Staff to file a sufficiency recommendation on revised digital map data or propose a new procedural schedule	March 23, 2016
Deadline for Commission Staff to provide revised maps and certificates to the Applicant for review and consent	April 22, 2016
Deadline for parties to file signed consent forms with the Commission showing consent to revised maps and certificates	May 4, 2016
Deadline for Commission Staff to file a recommendation on final disposition	May 10, 2016

II. Conclusion

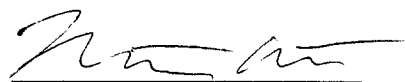
For the reasons stated above, Staff respectfully requests that the administrative law judge grant Staff's motion for extension and adopt the proposed revised procedural schedule.

DATED: March 7, 2016

Respectfully Submitted,

Margaret Uhlig Pemberton
Division Director
Legal Division

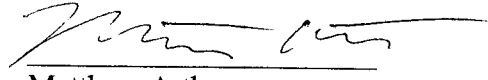
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CERTIFICATE OF SERVICE

I certify that a copy of this document will be served on all parties of record on this the 7th of March, 2016 in accordance with 16 Tex. Admin. Code § 22.74.


Matthew Arth