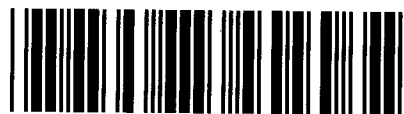




Control Number: 43587



Item Number: 5

Addendum StartPage: 0

APPLICATION OF TRINITY RTC GP, §
LLC TO OBTAIN WATER AND §
SEWER CERTIFICATES OF §
CONVENIENCE AND NECESSITY IN §
HARRIS COUNTY §

PUBLIC UTILITY COMMISSION

2014 DEC -1 AM 11:00

OF TEXAS
FILING CLERK

**COMMISSION STAFF'S RESPONSE TO ORDER NO. 2 AND REQUEST FOR
AN EXTENSION OF TIME**

COMES NOW the Staff (Staff) of the Public Utility Commission of Texas (Commission), representing the public interest, and files this Response to Order No. 2 and Request for an Extension of Time and would show the following:

I. BACKGROUND

On October 17, 2014, Trinity RTC GP, LLC (Applicant) filed an application to obtain new water and sewer certificates of convenience and necessity (CCN) in Harris County, Texas pursuant to TEX. WATER CODE ANN. Subchapter G and Title 16, TEX. ADMIN. CODE (16 TAC) Subchapter G.

On October 21, 2014, the Commission Administrative Law Judge (ALJ) issued Order No. 1, requiring Commission Staff to file comments on the administrative completeness of the application and proposed notice and to file comments regarding how this petition should be processed and propose a procedural schedule by October 31, 2014. On October 31, 2014, Staff filed its Response to Order No. 1, Status Update, and Request for an Extension of Time. On November 5, 2014, the ALJ issued Order No. 2 extending the deadline for Staff to file comments on the administrative completeness of the application and proposed notice and a proposed procedural schedule until December 1, 2014. This Response is timely filed.

II. STATUS UPDATE AND REQUEST FOR AN EXTENSION OF TIME

Staff is currently in the process of performing the mapping overlap check on the information submitted regarding the proposed CCN areas. The overlap check allows Staff to determine the location of the Applicant's proposed CCN area and is integral in determining whether the information submitted by the Applicant in its application is sufficient. The overlap check allows Staff to determine whether the Applicant's proposed CCN area overlaps with other

existing CCN areas and whether the Applicant has provided notice to the proper affected parties. As such, Staff cannot complete its administrative review of the application until this overlap check is complete. Therefore, good cause exists for Staff to request additional time to complete its overlap check of the proposed CCN areas before submitting a recommendation on the sufficiency and processing of this case. Staff respectfully requests that the ALJ extend the deadline for Staff to file comments on the administrative completeness of the application and proposed notice and proposed procedural schedule until January 6, 2015. Staff has conferred with the Applicant and is authorized to represent that the Applicant does not oppose this requested extension.

III. CONCLUSION

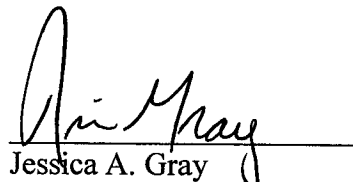
Staff respectfully requests that the ALJ extend the deadline for Staff to file comments on the administrative completeness of the application and proposed notice and a proposed procedural schedule until January 6, 2015, and is authorized to represent that the Applicant does not oppose this requested extension.

Date: December 1, 2014

Respectfully Submitted,

Margaret Uhlig Pemberton
Division Director
Legal Division

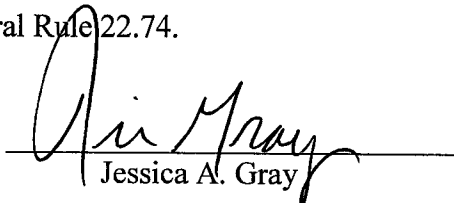
Shelah J. Cisneros
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DOCKET NO. 43587
CERTIFICATE OF SERVICE

I certify that a copy of this document will be served on all parties of record on December 1, 2014, in accordance with P.U.C. Procedural Rule 22.74.



Jessica A. Gray