



Control Number: 44621



Item Number: 30

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JOINT APPLICATION OF YES PREP §
PUBLIC SCHOOLS AND SUBURBAN §
UTILITY COMPANY TO DECERTIFY §
YES PREP PROPERTY FROM §
SUBURBAN WATER COMPANY'S §
CERTIFICATED SERVICE AREA §

PUBLIC UTILITY COMMISSION

OF TEXAS

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PUBLIC UTILITY COMMISSION
FILING CLERK

JOINT MOTION TO ADMIT EVIDENCE

Public Utility Commission of Texas (Commission) Staff; YES Prep Public Schools, Inc. (YES Prep); and Suburban Utility Company (Suburban) (collectively, Applicants) file this Motion to Admit Evidence. Commission Staff and Applicants request that certain evidence be admitted into the record in support of their filed Proposed Notice of Approval. In support of their Motion to Admit Evidence, Staff and Applicants state the following:

I. Background

On April 8, 2015, Applicants filed an application to decertify YES Prep's north central campus from Suburban's water certificate of convenience and necessity (CCN) No. 10835 with the Commission.¹ The CCN No. 10835 service area is located in Harris County, Texas.

On October 27, 2015, Commission Staff filed its Recommendation on Final Disposition. Commission Staff recommended that the Commission approve the application and approve the requested removal of YES Prep's property from Suburban's CCN.

On November 16, 2015, Commission Staff and Applicants filed their Proposed Notice of Approval.

II. Joint Motion to Admit Evidence

Commission Staff and Applicants request that the following evidence be admitted as evidence in the record:

- a. Exhibit 1: Joint Application for Decertification of YES Prep Property from Suburban's Retail Water Certificated Service Area and accompanying Exhibits A, B, and C (filed on April 8, 2015).

¹ This application was filed pursuant to the Emergency Order in *Request of YES Prep Public Schools for Emergency Order to Obtain Water Service from Sunbelt Fresh Water Supply District*, Docket No. 44322, Order (March 17, 2015).

- b. Exhibit 2: Amendment to Joint Application for Decertification of YES Prep Property from Suburban's Retail Water Certificated Service Area and accompanying Exhibit A (with Attachments 1, 2, 3, 4, 5, 6, 7, 8, 9, and 10), and Exhibit B (filed on April 16, 2015).
- c. Exhibit 3: Supplement to Joint Application for Decertification of YES Prep Property from Suburban's Retail Water Certificated Service Area and accompanying Exhibit A (filed on May 4, 2015).
- d. Exhibit 4: Supplement of Mapping Information to Joint Application for Decertification of YES Prep Property from Suburban's Certificated Water Service Area and accompanying Exhibits A and B (filed on May 15, 2015).
- e. Exhibit 5: Affidavit of Provision of Notice to Neighboring Utilities and Affected Parties and accompanying Exhibits 1, 2, 3, 4, 5, 6, 7, 8, 9, 10, 11, 12, and 13 (filed on June 30, 2015).
- f. Exhibit 6: Original Publisher's Affidavit and accompanying Exhibit A (filed on July 1, 2015).
- g. Exhibit 7: Affidavit of Provision of Notice to Neighboring Utilities and Affected Parties (filed on August 20, 2015).
- h. Exhibit 8: YES Prep's Response to Commission Staff's First Request for Information and accompanying attachments (filed on October 22, 2015).
- i. Exhibit 9: Commission Staff's Response to Order No. 8 and Final Recommendation and accompanying Attachments A, B, C, and D (filed on October 27, 2015).

III. Conclusion

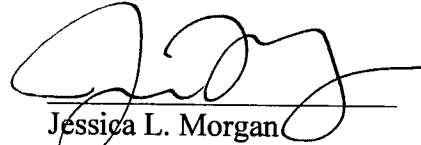
Commission Staff and Applicants request that the evidence specified in this Motion to Admit Evidence be admitted into the record. Commission Staff and Applicants further request any and all other relief to which they are justly entitled.

Dated: November 16, 2015

Respectfully Submitted,

Margaret Uhlig Pemberton
Division Director
Legal Division

Karen S. Hubbard
Managing Attorney
Legal Division

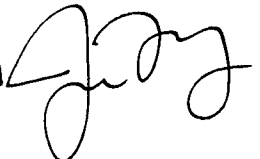


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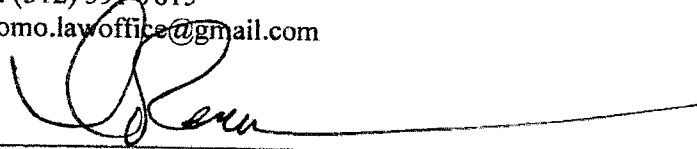
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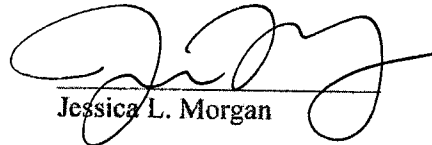
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Attorney for Suburban Utility CO.

DOCKET NO. 44621

CERTIFICATE OF SERVICE

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



Jessica L. Morgan