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PUBLIC UTILITY COMMISSION
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**APPLICATION OF VM NEIGHBORS
WATER GROUP FOR EXEMPT
UTILITY REGISTRATION**

**PUBLIC UTILITY COMMISSION OF
TEXAS**

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**APPLICANT'S RESPONSE TO ORDER NO. 2,
REQUEST TO ABATE, AND
REQUEST FOR EXTENSION TO RESPOND TO DEFICIENCIES IN APPLICATION**

Comes now, applicant VM Neighbors Water Group (VM Neighbors), and would show the following in response to the July 16, 2015, Order No. 2 of the Public Utility Commission (Commission):

I. BACKGROUND

VM Neighbors filed an application for exempt utility registration with the Commission on June 16, 2015. *See* Tex. Water Code Ann. § 13.242(c) (West 2008 & Supp. 2014) and 16 Tex. Admin. Code § 24.103(d) (TAC).

To qualify for exempt utility registration, a utility must not be located within the certificated area of another retail public utility. 16 TAC § 24.103(d)(1)(c). The area VM Neighbors serves is located within the boundaries of the certificate of convenience and necessity (CCN) of Childress Creek Water Supply Corporation (Childress). Childress supports the efforts of VM Neighbors to provide utility service within Childress's CCN, and on June 16, 2015, Childress filed an application to amend its CCN by decertifying the VM Neighbors tracts. Childress's application to decertify is currently pending before the Commission as Docket No. 44843.

On July 15, 2015, Commission Staff responded to the Commission's Order No. 1, recommending that the Commission find VM Neighbors' application deficient in various regards

and also recommending that VM Neighbors request to abate this action pending resolution of Childress's application to decertify the relevant portion of its CCN in Docket No. 44843. On July 16, 2015, the Commission rendered Order No. 2 consistent with Staff's recommendation.

Regarding the deficiencies in the application, Staff recommended that VM Neighbors provide: 1.) confirmation of the total current and future connections; 2.) a copy of its water purchase agreement; 3.) documentation to support its tap fee; and 4.) a large scale map delineating the proposed service area with enough detail to accurately locate the proposed service area in relation to surrounding roads, streets, and highways.

VM NEIGHBORS' REQUEST TO ABATE AND REQUEST FOR EXTENSION

Because VM Neighbors will be requesting to abate, VM Neighbors would prefer to wait to submit the additional requested documents until Docket 44843 is completely processed. Counsel for VM Neighbors has discussed this request with Staff attorney Thomas Tynes, and Staff has no objection to the request for more time to submit the requested additional information.

VM Neighbors respectfully requests that the Commission abate this proceeding until Docket 44834 is processed. VM Neighbors further respectfully requests an extension of time to respond to the deficiencies in its application until after Docket 44843 is completely processed.

Respectfully Submitted,

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By: _____


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PUC Docket No. 44849

CERTIFICATE OF SERVICE

I, Susana E. Canseco, attorney for applicant VM Neighbors Water Group, certify that a copy of this document was served on all parties of record in this proceeding on the 14th day of August, 2015 in accordance with 16 TAC § 22.74.



Susana E. Canseco