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APPLICATION OF RANCH §
UTILITIES, L.P. AND EMCAD §
WATER AND WASTEWATER, LLC §
FOR SALE, TRANSFER, OR §
MERGER OF FACILITIES AND §
CERTIFICATE, RIGHTS IN PARKER §
COUNTY §

2017 JUN 5 PM 4:31
BEFORE THE
PUBLIC UTILITY COMMISSION
FILING CLERK
PUBLIC UTILITY COMMISSION
OF TEXAS

**JOINT RESPONSE TO ORDER NO. 7 AND REQUEST FOR EXTENSION TO FILE
PROOF OF SALE**

This motion responds to Order No. 7, which requires Ranch Utilities, L.P. (“Ranch Utilities”) and EMCAD Water and Wastewater, LLC (“EMCAD”) to file evidence, by June 7, 2017, that the transaction has been consummated and that the customer deposits have been addressed. The order recognizes that the applicants have one year, from June 30, 2016, to complete the transaction.

The applicants have been working diligently to consummate the sale of the property. That closing has been delayed due to two issues. First, the parties identified an access easement issue to be addressed as a prerequisite to closing the transaction. Due to a variety of unforeseen circumstances, the resolution of that access issue has taken longer than the parties anticipated. However, based on recent discussions with the title company assisting on the matter, resolution of that issue is imminent.

Second, the property to be sold was the subject of a Texas Commission on Environmental Quality (“TCEQ”) enforcement action for violations alleged in 2015 and early 2016. The enforcement action resulted in an agreed order against Ranch Utilities, which the TCEQ adopted at its May 25, 2017 Commission Agenda. The Agreed Order imposes certain injunctive provisions upon Ranch Utilities. EMCAD requested that Ranch Utilities satisfy those injunctive

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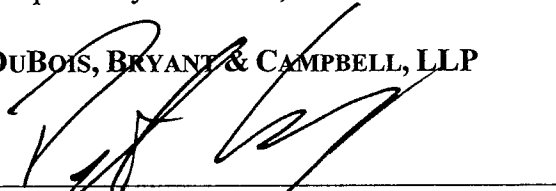
provisions as a prerequisite to closing the transaction. Ranch Utilities is prepared to provide TCEQ the information satisfying the injunctive provisions within the next 10 – 14 days.

Based on the circumstances discussed above, the applicants believe that a 60-day extension to the deadline to consummate the sale is appropriate. Therefore, the applicants hereby request a 60-day extension to the June 30, 2017 deadline. Recognizing that 16 Tex. Admin. Code §24.109(e) as applicable to this transaction allows up to one year for the transaction to be consummated, the applicants request that the deadline to file proof of the consummation of the transaction not be ordered to occur prior to the June 30, 2017 deadline.

The undersigned files this motion with permission of EMCAD. The undersigned has consulted with PUC Staff counsel and PUC Staff counsel is not opposed to the request set forth herein.

Respectfully submitted,

DUBOIS, BRYANT & CAMPBELL, LLP



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ATTORNEYS FOR RANCH UTILITIES, L.P.

CERTIFICATE OF SERVICE

By my signature above, I hereby certify that on the 5th day of June, 2017, the foregoing document was served via first class mail to the following:

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