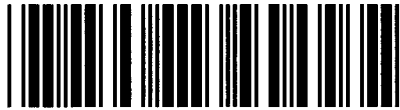


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RECEIVED

APPLICATION OF CITY OF §
 GREGORY TO OBTAIN §
 CERTIFICATES OF CONVENIENCE §
 AND NECESSITY IN SAN PATRICIO §
 COUNTY §

PUBLIC UTILITY COMMISSION

2016 APR -1 AM 9:00

OF TEXAS

PUBLIC UTILITY COMMISSION
FILING CLERK

JOINT REQUEST TO AMEND PROCEDURAL SCHEDULE

COMES NOW the Staff of the Public Utility Commission of Texas (Staff), representing the public interest, and files this Joint Request to Amend Procedural Schedule in response to Order No. 2 and would show the following:

I. BACKGROUND

On December 31, 2015, the City of Gregory (Gregory) filed an application with the Public Utility Commission of Texas (Commission) to obtain new water and sewer certificates of convenience and necessity (CCN) in San Patricio County, Texas. Gregory seeks to acquire CCNs for the area within its extraterritorial jurisdiction.

Order No. 2, issued February 2, 2016, found Gregory's application administratively incomplete and established deadlines of March 2, 2016 for Gregory to amend its application and April 1, 2016 for Staff to file additional comments on the administrative completeness of the application. Staff's pleading is therefore timely filed.

II. JOINT REQUEST TO AMEND PROCEDURAL SCHEDULE

Due to an unforeseen delay, Gregory was unable to amend its application until March 29, 2016. This leaves Staff with less than a week to review the amended application. This is an insufficient amount of time for Staff to properly review the new material, especially since the procedural schedule established in Order No. 2 contemplated that Staff would have at least 30 days to review Gregory's supplemental materials. In light of these facts, and given a previously scheduled vacation of the Staff expert assigned to this case, the parties jointly request that the procedural schedule be amended to give Staff until May 9, 2016 to review Gregory's amended application and file additional comments on the administrative completeness of the application, along with a procedural schedule, if necessary.

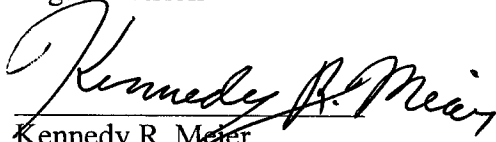
III. CONCLUSION

For the reasons stated above, the parties respectfully request that the procedural schedule be amended to allow Staff to have until May 9, 2016 to review Gregory's amended application and file additional comments regarding the administrative completeness of the application and a proposed procedural schedule, if necessary.

Respectfully Submitted,

Margaret Uhlig Pemberton
Division Director
Legal Division

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DOCKET NO. 45489

CERTIFICATE OF SERVICE

I certify that a copy of this document will be served on all parties of record on this the 1st of April, 2016 in accordance with 16 TAC § 22.74.


Kennedy R. Meier