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SOAH DOCKET NO. 473-16-5296. MSCEIVED . PUC DOCKET NO. 45702 *

2017 MAY 26 PM 1: 27

APPLICATION OF CITY OF CIBOLO FOR SINGLE CERTIFICATION IN INCORPORATED AREA AND TO DECERTIFY PORTIONS OF GREEN VALLEY SPECIAL UTILITY DISTRICT SEWER CERTIFICATE OF CONVENIENCE AND NECESSITY IN **GUADALUPE COUNTY**

OF TEXAS

CITY OF CIBOLO'S RESPONSE TO GREEN VALLEY'S REQUEST FOR ORAL ARGUMENT

TO THE HONORABLE COMMISSIONERS OF THE PUBLIC UTILITY COMMISSION ("COMMISSION"):

COMES NOW, the City of Cibolo ("Cibolo") and files this Response to Green Valley Special Utility District's ("GVSUD") Request for Oral Argument ("Request"), and in support hereof would show the following:

Cibolo opposes GVSUD's Request under 16 Texas Administrative Code § 22.262(d)(3). This matter has already been thoroughly briefed by the Parties through their Initial (Closing) Briefs, Replies to Initial Briefs. Exceptions to the Proposal for Decision, and the Response/Replies to those Exceptions. Such filings from GVSUD contain multiple iterations of the same arguments regarding the three referred issues contemplated in this hearing, namely, what should be considered "property" under Texas Water Code § 13:255, Cibolo contends that the Commission has been fully briefed.

If the Commission grants GVSUD's Request, then Cibolo also requests that it have the opportunity to provide oral argument as well. Cibolo appreciates the Commission's consideration of this Response and requests any and all other relief to which it is entitled.

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ATTORNEYS FOR THE CITY OF CIBOLO

CERTIFICATE OF SERVICE

I hereby certify that a true and correct copy of the foregoing document was transmitted by fax; hand-delivery and/or regular, first class mail on this 26th day of May, 2017 to the parties of record in accordance with 16 Texas Administrative Code § 22.74.

David J. Kléin