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Item Number: 152

Addendum StartPage: 0

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

PUBLIC UTILITY COMMISSION

OF TEXAS

CITY OF CIBOLO'S MOTION FOR LEAVE TO EXCEED PAGE LIMIT FOR BRIEF

TO THE HONORABLE COMMISSIONERS OF THE PUBLIC UTILITY COMMISSION:

The City of Cibolo (the "City") files this Motion for Leave to Exceed Page Limit for Briefs and in support hereof would show the following:

A full analysis of the applicable law and facts at issue in this proceeding, compelled the City to exceed the 50-page limit imposed by 16 Tex. Admin. Code §22.72(f). Under that same rule, the presiding officer is allowed to permit parties to exceed this standard page limit. In establishing a larger page limit, the presiding officer shall consider factors including the burden of proof and the extent of opposition to a party's position that needs to be addressed in the brief.

Although the District has the burden of proof in its motion, the City must defend against the allegations asserted in Green Valley Special Utility District's Supplemental Plea to the Jurisdiction, Motion to Dismiss, and, in the Alternative, Motion to Abate. It is the exhibits that cause the brief to exceed the page limit.

WHEREFORE, PREMISES CONSIDERED, the City respectfully requests that it be granted leave to exceed the page limit as allowed under 16 Tex. Admin. Code § 22.72(f). The City also asks for any other relief to which it is justly entitled.

152

Respectfully submitted,

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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 28th day of August, 2017 to the parties of record in accordance with 16 Texas Administrative Code § 22.74.


David J. Klein