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

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PUBLIC UTILITY COMMISSION
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APPLICATION OF CITY OF CIBOLO	§	BEFORE THE STATE OFFICE
FOR SINGLE CERTIFICATION IN	§	
INCORPORATED AREA AND TO	§	OF
DECERTIFY PORTIONS OF GREEN	§	
VALLEY SPECIAL UTILITY	§	ADMINISTRATIVE HEARINGS
DISTRICT'S SEWER CERTIFICATE	§	
OF CONVENIENCE AND NECESSITY	§	
IN GUADALUPE COUNTY	§	

**GREEN VALLEY'S REQUEST FOR EXTENSION
OF CURRENT PROCEDURAL SCHEDULE DEADLINES**

COMES NOW Green Valley Special Utility District ("Green Valley" or "GVSUD") and respectfully requests that the Honorable Administrative Judge grant a one-week extension as to each of the procedural schedule deadlines established in SOAH Order No. 12.¹ In support of its request, Green Valley shows as follows.

I. REQUEST

In SOAH Order No. 12, the ALJ established the following dates for the remaining issues to be addressed in Phase II of this docket:

- | | |
|--------------------|--|
| September 8, 2017 | The parties jointly file a stipulation for each of Preliminary Order Issue Nos. 1-8 that are stipulated, and any related evidence. |
| September 15, 2017 | The parties file their initial briefs regarding any Preliminary Order Issue Nos. 1-8 that are not stipulated. |
| September 22, 2017 | The parties file their response briefs regarding any Preliminary Order Issue Nos. 1-8 that are not stipulated. The record closes. |

Good cause exists to support Green Valley's request for a one-week extension of the deadline dates above established in SOAH Order No. 12. Nearly a full month has passed since these deadlines were established. The SOAH Order No. 12 deadline to submit stipulations and

¹ SOAH Order No. 12 Memorializing Prehearing Conference; Denying Motion to Dismiss or Abate; Adopting Procedural Schedule; and Stating Record Close Date (Aug. 14, 2017).

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additional evidence is today. Up until nearly 4:00 p.m. yesterday, the afternoon of September 7, 2017, Green Valley received no communication from Cibolo about the draft pleading or exhibits Cibolo wished to propose for today's deadline which was intended to be a joint filing. Green Valley ultimately received such documents from Cibolo after 4:00 p.m. on September 7, 2017, but understands Staff received a draft stipulation document one day prior on September 6, 2017. That draft was not shared with Green Valley.

Substantial prejudice could result to Green Valley if required to review, analyze, negotiate, and determine whether it can agree with stipulations or supporting documents with less than a single day's notice. Further, Green Valley understands Commission Staff may have edits to the draft provided on September 6, 2017 anticipated to be shared sometime today and Green Valley will likely have its own edits that the other Parties will need to review.

Prior to receiving the proposed documents from Cibolo, Green Valley's counsel conferred with Commission Staff about whether a deadline extension would be appropriate given the circumstances. Commission Staff agreed that a one-week extension of today's deadline would be appropriate, but only if the other two remaining deadlines established in SOAH Order No. 12 were also moved back accordingly. Green Valley made this request to Cibolo, but Cibolo declined to agree to the requested deadline extensions.

In sum, with the concurrence of Commission Staff and despite Cibolo's objection, Green Valley requests that each remaining deadline set forth in SOAH Order No. 12, including today's filing deadline, be extended for one week each. This extension should permit a reasonable amount of time for all Parties to fully consider and discuss filing contemplated in SOAH Order No. 12 for today as proposed by Cibolo and to make follow-up filings at the same intervals originally contemplated.

II. CONCLUSION AND PRAYER

For the foregoing reasons, Green Valley respectfully requests the Honorable Administrative Law Judge issue an order granting the requested one-week extensions on all remaining deadlines established by SOAH Order No. 12. Green Valley further requests all additional relief to which it is justly entitled at law or in equity.

Respectfully submitted,

By: 

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**ATTORNEYS FOR GREEN VALLEY SPECIAL
UTILITY DISTRICT**

CERTIFICATE OF SERVICE

I hereby CERTIFY that on September 8, 2017, a true and complete copy of the above was sent by the method indicated to counsel of record at the following addresses in accordance with P.U.C. PROC. R. 22.74:

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ATTORNEY FOR COMMISSION STAFF


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