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SOAH DOCKET NO. 473-16-5739.WS
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2017 SEP 22 PM 2:35

APPLICATION OF CITY OF CIBOLO §
TO AMEND A SEWER CERTIFICATE §
OF CONVENIENCE AND NECESSITY §
UNDER WATER CODE SECTION 13.255 §
AND TO DECERTIFY A PORTION OF §
GREEN VALLEY SPECIAL UTILITY §
DISTRICT'S CERTIFICATE RIGHTS IN §
BEXAR COUNTY §

STATE OFFICE OF PUBLIC UTILITY COMMISSION
FILING CLERK
ADMINISTRATIVE HEARINGS

COMMISSION STAFF'S REPLY BRIEF

Commission Staff of the Public Utility Commission of Texas files its Reply Brief in response to Green Valley Special Utility District (GVSUD). In support thereof, Staff states the following:¹

I. Response

A. Cibolo's notice is sufficient and Application should be deemed complete (Preliminary Issues 2, 3 and 4).

As explained in Staff's initial brief,² Staff believes the City of Cibolo's (Cibolo) notice meets the requirement of Texas Water Code Ann. § 13.255(b) (West 2016) (TWC). As GVSUD declined to offer further briefing on this topic and merely incorporated its response to Staff's Recommendation on Administrative completeness,³ Staff has no response.

B. Cibolo's public-drinking-water system complies with the TCEQ's minimum requirements (Preliminary Issue 5).

Cibolo has demonstrated compliance with the Commission's minimum requirements for public drinking water systems pursuant to TWC § 13.255(m). The correspondence contained in Attachment E of Cibolo's initial brief⁴ proves that the Texas Commission on Environmental

¹ The deadline for parties' reply briefs is September 29, 2017. Commission Staff's Reply Brief is timely filed.

² Commission Staff's Initial Brief at 5 (Sep. 22, 2017).

³ Green Valley's Initial Brief on Second Phase Hearing Issues at 2 (Sep. 22, 2017).

⁴ Initial Brief of the City of Cibolo, Attachment E (Sep. 22, 2017).

Quality violations cited by GVSUD have been resolved.⁵ Therefore, Staff continues to recommend that the Administrative Law Judge find that Cibolo meets the requirements of TWC 13.255(m).

II. Conclusion

Cibolo provided sufficient notice of their application to GVSUD, provided all information necessary to show that their application is administratively complete, and their public-drinking-water-system is in compliance with minimum drinking water standards.

⁵ GVSUD's Initial Brief at 3-5.

Dated: September 29, 2017

Respectfully Submitted,

**PUBLIC UTILITY COMMISSION OF
TEXAS LEGAL DIVISION**

Margaret Uhlig Pemberton
Division Director

Karen S. Hubbard
Managing Attorney



Landon J. Lill
State Bar No. 24092700
1701 N. Congress Avenue
P.O. Box 13326
Austin, Texas 78711-3326
(512) 936-7377
(512) 936-7268 (facsimile)
Landon.Lill@puc.texas.gov

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CERTIFICATE OF SERVICE

I certify that a copy of this document will be served on all parties of record on September 29, 2017, in accordance with P.U.C. Procedural Rule 22.74.



Landon J. Lill