



Control Number: 45702



Item Number: 40

Addendum StartPage: 0

APPLICATION OF THE 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

§  
§  
§  
§  
§  
§  
§

BEFORE THE PUBLIC UTILITY COMMISSION

2016 JUN 16 AM 10:32  
PUBLIC UTILITY COMMISSION  
FILING CLERK

COMMISSION OF TEXAS

**GREEN VALLEY SPECIAL UTILITY DISTRICT'S AGREED  
MOTION TO EXTEND DEADLINES**

Green Valley Special Utility District ("Green Valley SUD"), subject to its Plea to the Jurisdiction and Motion to Dismiss, files this Agreed Motion to Extend Deadlines in this docket involving City of Cibolo's ("City" or "Applicant") Application for Single Certification in Incorporated Area and to Decertify Portions of Green Valley SUD's Sewer Certificate of Convenience and Necessity ("CCN") in Guadalupe County ("Application") and in support would show as follows.

**Deadline Extension Request for Appraiser Meeting**

On June 14, 2016, the Honorable Administrative Law Judge ("ALJ") issued Order No. 6 Establishing Timelines and Requiring Filings.<sup>1</sup> Order No. 6 established June 17, 2016 as the deadline for the parties' independent appraisers to meet based on TEX. WATER CODE § 13.255(1) and 16 TEX. ADMIN. CODE § 24.120(m). However, the 10<sup>th</sup> business day after Green Valley SUD appointed its appraiser is June 21, 2016. Green Valley SUD and the City have already scheduled an appraiser meeting for June 21, 2016 on the 10<sup>th</sup> business day after Green Valley SUD appointed its appraiser, and all parties would like to keep that meeting date intact. Green Valley SUD has

---

<sup>1</sup> Item No. 34.

conferred with the City and Staff about this request. Both concur that extending the deadline for the appraiser meeting is reasonable and in line with the applicable statute and PUC rule.

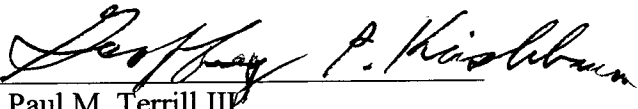
#### **Deadline Extension Request for Appraisal**

Order No. 6 also states “[w]ithin two business days of the appraisers’ first meeting, the City and Green Valley shall notify the Commission of the date the meeting took place and provide a copy of their respective appraisals.” This requirement is not found in TEX. WATER CODE § 13.255(1) and 16 TEX. ADMIN. CODE § 24.120(m). Green Valley SUD and the City respectfully request a full week (7 calendar days) to file their appraisals after the June 21, 2016 meeting, or June 28, 2016, as this is a more reasonable time period within which to allow their appraisers to finalize the appraisal following their meeting. Green Valley SUD has conferred with both Commission Staff and the City about this request and they agree that extending this deadline to June 28, 2016 is reasonable.

#### **Conclusion and Prayer**

Green Valley SUD, with the agreement of the other parties in this docket, respectfully requests the Honorable Administrative Law Judge issue an order that: (1) extends the deadline for parties’ independent appraisers to meet to ten business days from June 7, 2016 or Tuesday, June 21, 2016; and (2) extends the deadline for parties to file their appraisals to Tuesday, June 28, 2016.

Respectfully submitted,

By: 

Paul M. Terrill III  
State Bar No. 00785094  
Geoffrey P. Kirshbaum  
State Bar No. 24029665  
TERRILL & WALDROP  
810 W. 10<sup>th</sup> Street  
Austin, Texas 78701  
(512) 474-9100  
(512) 474-9888 (fax)

**ATTORNEYS FOR GREEN VALLEY SPECIAL  
UTILITY DISTRICT**

**CERTIFICATE OF SERVICE**

I hereby CERTIFY that on June 16, 2016, 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:

David Klein  
Christie Dickenson  
Lloyd Gosselink  
816 Congress Ave., Suite 1900  
Austin, Texas 78701

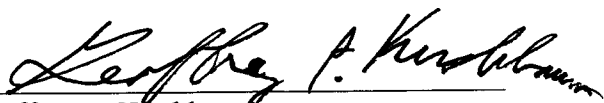
*via fax to: (512) 472-0532*

**ATTORNEY FOR APPLICANT**

Landon Lill  
Public Utility Commission of Texas  
1701 N Congress PO Box 13326  
Austin, Texas 78711-3326

*via fax to: (512) 936-7268*

**ATTORNEY FOR COMMISSION STAFF**

  
Geoffrey P. Kirshbaum