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PUC DOCKET NO. 45956
SOAH DOCKET NO. 473-16-5379.WS

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PUBLIC UTILITY COMMISSION
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APPLICATION OF CITY OF SCHERTZ § 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. 8¹ In support of its request, Green Valley shows as follows.

I. REQUEST

In SOAH Order No. 8, the ALJ established the following dates for the remaining issues to be addressed in Phase II of this docket:

September 8, 2017 Parties to file stipulations and additional evidence concerning remaining issues.

September 15, 2017 Parties to file initial briefs on remaining issues.

September 22, 2017 Parties to file reply briefs on remaining issues.

Good cause exists to support Green Valley's request for a one-week extension of the deadline dates above established in SOAH Order No. 8. Nearly a full month has passed since these deadlines were established. The Order No. 8 deadline to submit stipulations and additional evidence is today. Up until nearly 4:00 p.m. yesterday, the afternoon of September 7, 2017, Green

¹ SOAH Order No. 8 Denying Motions to Dismiss and Abate and Setting Schedule (Aug. 10, 2017).

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Valley received no communication from Schertz about the draft pleading or exhibits Schertz wished to propose for today's deadline which was intended to be a joint filing. Green Valley ultimately received such documents from Schertz 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.

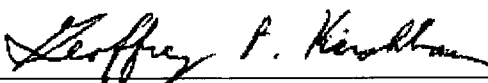
Prior to receiving the proposed documents from Schertz, Green Valley's counsel conferred with Commission Staff about whether a deadline extension would be appropriate given the circumstances. Commission Staff agreed that a one-week extension of today's deadline would be appropriate, but only if the other two remaining deadlines established in SOAH Order No. 8 were also moved back accordingly. Green Valley made this request to Schertz, but Schertz declined to agree to the requested deadline extensions.

In sum, with the concurrence of Commission Staff and despite Schertz's objection, Green Valley requests that each remaining deadline set forth in SOAH Order No. 8, 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 the filing contemplated in SOAH Order No. 8 for today as proposed by Schertz 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. 8. 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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