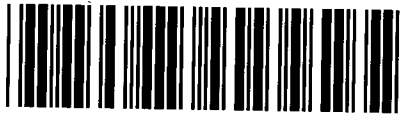


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RECEIVED

APPLICATION OF THE CITY OF  
 PRINCETON TO AMEND ITS  
 CERTIFICATES OF CONVENIENCE  
 NECESSITY AND TO DECERTIFY A  
 PORTION OF ALTOGA WATER  
 SUPPLY CORPORATION'S WATER  
 SERVICE AREA IN COLLIN COUNTY

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BEFORE THE PUBLIC UTILITY

2017 MAR 28  
 PUBLIC UTILITY COMMISSION  
 FILING CLERK

COMMISSION OF TEXAS

**CITY OF PRINCETON'S RESPONSE TO ORDER NO. 1  
AND MOTION TO CONSOLIDATE**

COMES NOW the City of Princeton, Texas ("City" or "Princeton") and files this Response to Order No. 1. The City would respectfully show as follows:

**I. Introduction**

The Application seeks to amend the City's water and sewer CCNs and to decertify the water CCN of Altoga Water Supply Corporation ("Altoga"). Order No. 1 in this proceeding ordered the comments regarding how this petition should be processed and propose a procedural schedule. This response is timely filed.

**II. Response and Motion to Consolidate**

This case is similar to PUC Docket No. 46452 wherein North Collin Special Utility District ("North Collin") seeks the CCN area currently certificated to Altoga. As discussed in the City's response to Staff's Motion to Abate, both North Collin and the City must make substantially similar demonstrations in order to be granted their requested relief. However, Princeton has the additional burden to demonstrate that neither Altoga nor North Collin should be allowed to serve within the Altoga CCN area. It is a burden that Princeton is prepared to shoulder. CCN requests seeking the same service area contain common questions of fact and law. As such, trying the cases in a consolidated fashion serves the interest of judicial economy and saves resources for all parties involved, all of which are public entities.

Thus, the City believes that the wisest course of action in this proceeding is to consolidate

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the case with PUC Docket No. 46452 and set a collective procedural schedule once consolidation occurs. Pursuant to PUC R. § 22.34(a), the City moves consolidation of this case with PUC Docket No. 46452.

### **III. Conclusion and Prayer**

The City respectfully requests the Commission:

- (1) Consolidate this case with PUC Docket No. 46452.
- (2) Grant the City all other and further relief to which it is justly entitled.

Respectfully submitted,

**Russell & Rodriguez, L.L.P.**

1633 Williams Drive, Building 2, Suite 200

Georgetown, Texas 78628

(512) 930-1317

(866) 929-1641 (Fax)

/s/ Arturo D. Rodriguez, Jr.

ARTURO D. RODRIGUEZ, JR.

State Bar No. 00791551

**ATTORNEY FOR THE CITY OF  
PRINCETON**

## **CERTIFICATE OF SERVICE**

I hereby certify that on this 8<sup>th</sup> day of March, 2017, a true and correct copy of the foregoing document has been sent via facsimile, first class mail, or hand-delivered to the following counsel of record:

***Via Electronic Mail & Facsimile***

Landon J. Lill  
Attorney – Legal Division  
Public Utility Commission of Texas  
1701 N. Congress Avenue  
Austin, TX 78701  
(512) 936-7268 Fax  
landon.lill@puc.texas.gov

/s/ Arturo D. Rodriguez, Jr.  
ARTURO D. RODRIGUEZ, JR.