



Control Number: 47265



Item Number: 12

Addendum StartPage: 0

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DOCKET NO. 47265

2017 OCT 12 PM 2:57

APPLICATION OF CITY OF §
MIDLOTHIAN AND CITY OF GRAND §
PRAIRIE FOR APPROVAL OF A §
SERVICE AREA CONTRACT UNDER §
TEXAS WATER CODE § 13.248 AND TO §
AMEND CERTIFICATES OF §
CONVENIENCE AND NECESSITY IN §
ELLIS COUNTY §

BEFORE THE PUBLIC UTILITY COMMISSION
FILING CLERK

PUBLIC UTILITY COMMISSION

OF TEXAS

CITY OF GRAND PRAIRIE'S MOTION FOR EXTENSION

COMES NOW, the City of Grand Prairie ("Grand Prairie") and files this Motion for Extension. In support thereof, Grand Prairie shows the following:

I. BACKGROUND

On October 12, 2017, Grand Prairie filed the Joint Proposed Notice of Approval and Motion to Admit Evidence ("Joint Notice") after conferring with Public Utility Commission ("Commission") Staff ("Staff") and the City of Midlothian ("City"). The City had agreed to the filing, and it was Grand Prairie's understanding that the Joint Notice was acceptable to Commission Staff as well, based upon a phone conference and the email attached hereto as Exhibit A. However, it is now Grand Prairie's understanding that Commission Staff had not approved the filing and that Commission Staff recommends that Grand Prairie file a Motion for Extension. It is obviously critical that any jointly filed document be supported by all parties, and for these reasons, Grand Prairie files this Motion. Grand Prairie has conferred with Commission Staff regarding this Motion, and it is Grand Prairie's understanding that counsel for Commission Staff supports this Motion.

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II. MOTION FOR EXTENSION

Grand Prairie respectfully requests the Commission grant a one week extension until October 19, 2017 to allow Grand Prairie and the City to confer with Staff on the contents of the Joint Notice.

III. PRAYER

The City of Grand Prairie respectfully requests that the Commission grant this Motion for Extension, and to all other relief to which it is entitled.

Respectfully submitted,

**LLOYD GOSSELINK ROCHELLE
& TOWNSEND, P.C.**

816 Congress Avenue, Suite 1900

Austin, Texas 78701

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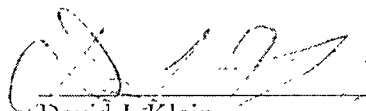
State Bar No. 24101607

mchambers@lglawfirm.com

ATTORNEYS FOR CITY OF GRAND PRAIRIE

CERTIFICATE OF SERVICE

I hereby certify that a true and correct copy of the foregoing document was transmitted by fax, hand-delivery and/or regular, first class mail on this 12th day of October 2017 to the parties of record, in accordance with 16 Tex. Admin. Code § 22.74.



David J. Klein

Subject: FW: Filing Due Today
Attachments: 47341_8_953466.pdf; 47146_9_945699.pdf; 47218_16_951598.pdf

From: Nwonuma, Ashley [<mailto:Ashley.Nwonuma@puc.texas.gov>]
Sent: Thursday, October 12, 2017 9:24 AM
To: Maris Chambers
Subject: RE: Filing Due Today

Hello Maris,

I just wanted to email examples of where the applicant has filed the joint proposed notice of approval but just added a line that Staff has reviewed and agreed to the pleading.

Thanks,
Ashley

Ashley Nwonuma
Attorney, Legal Division
Public Utility Commission of Texas
ashley.nwonuma@puc.texas.gov | (512) 936-7163

From: Maris Chambers [<mailto:mchambers@jglawfirm.com>]
Sent: Thursday, October 12, 2017 9:04 AM
To: Nwonuma, Ashley <Ashley.Nwonuma@puc.texas.gov>
Cc: David Klein <dklein@jglawfirm.com>, Lissette Ruiz <lruiz@jglawfirm.com>
Subject: Filing Due Today

WARNING: EXTERNAL SENDER. Always be cautious when clicking links or opening attachments. NEVER provide your user ID or password.

Ashley,

Please review and approve the attached joint filing. The proposed order is written to be filed by you, but the final version is still subject to change as I have also requested that Grand Prairie and Midlothian review and approve it by noon today. Please don't hesitate to call with any questions or concerns. I apologize for missing your call yesterday afternoon.

Best,

Maris M. Chambers
Associate Attorney

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ATTENTION TO PUBLIC OFFICIALS AND OFFICIALS WITH OTHER INSTITUTIONS SUBJECT TO THE OPEN MEETINGS ACT

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