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DOCKET NO. 47592

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2019 FEB 11 AM 9:05  
BEFORE THE  
PUBLIC UTILITY COMMISSION  
FILING CLERK

APPLICATION OF JENNIFER FULTZ §  
RECEIVER FOR THUNDERBIRD §  
POINT WATER SYSTEM AND BI- §  
COUNTY WATER SUPPLY §  
CORPORATION FOR SALE, §  
TRANSFER OR MERGER OF §  
FACILITIES AND CERTIFICATE §  
RIGHTS IN CAMP COUNTY §

PUBLIC UTILITY COMMISSION  
OF TEXAS

**RECEIVER'S REQUEST FOR EXTENSION  
TO COMPLETE TRANSACTION**

TO THE HONORABLE ADMINISTRATIVE LAW JUDGE:

Comes Now Receiver for Thunderbird Point Water System and files this Request for Extension to Complete Transaction. On July 9, 2018, Order No. 5, Granting Receiver's Request for Extension to Complete Transaction was filed establishing a deadline of 180 days from the original approval deadline of August 6, 2018, for the transaction to be completed, same being February 6, 2019. This pleading is therefore timely filed.

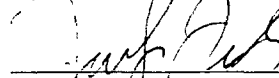
**I.  
REQUEST FOR EXTENSION**

Receiver requests an extension of 180 days from the expiration of the original approval to file proof that the transaction has been consummated and customer deposits have been addressed. The purpose of the request is to allow the Office of the Attorney General to file an additional petition to include American Central Land Corporation into the Receivership. This will then allow the Receiver to have authority to convey the real property where the Thunderbird Point Water System's plant is located to Bi-County Water Supply Corporation. The Receiver does not seek this extension for purposes of delay.

**II.**  
**CONCLUSION**

Receiver respectfully requests that the Request for Extension to Complete Transaction to August 2, 2019, be granted. The undersigned has consulted with Bi-County Water Supply Corporation, who has indicated they do not oppose this request.

Respectfully Submitted,



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JENNIFER FULTZ, Receiver for the assets  
of Thunderbird Point Water System

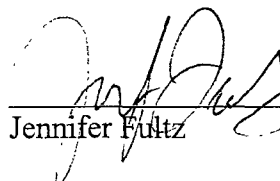
**Certificate of Service**

I, Jennifer Fultz, Receiver certify that a copy of the foregoing Request for Extension to Complete Transaction was forwarded on the 5th day of February 2019 to the following:

Erin Snody  
SBN 24093056  
Assistant Attorney General  
Environmental Protection Division  
P. O. Box 12548, Capitol Station  
Austin, Texas 78711-2548  
Erin.Snody@oag.texas.gov  
*Via Email*

Harlton Taylor  
General Manager  
Bi-County Water Supply Corp.  
P. O. Box 848  
Pittsburg, Texas 75686  
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*Via Email*

Texas Commission on Environmental Quality  
Water Supply Division  
P. O. Box 13087  
Austin, Texas 78711-3087  
Dorothy A. Young (dorothy.young@tceq.texas.gov)  
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\_\_\_\_\_  
Jennifer Fultz