



Control Number: 48350



Item Number: 114

Addendum StartPage: 0

APPLICATION OF THE CITY OF  
DAYTON FOR CERTIFICATES OF  
CONVENIENCE AND NECESSITY IN  
LIBERTY AND HARRIS COUNTIES

§  
§  
§  
§  
§

BEFORE THE  
PUBLIC UTILITY COMMISSION  
OF TEXAS

CITY OF DAYTON'S STATUS UPDATE

TO: THE PRESIDING ADMINISTRATIVE LAW JUDGE AT THE STATE OFFICE  
OF ADMINISTRATIVE HEARINGS:

COMES NOW, the City of Dayton ("City"), and files this Status Update ("Status  
Update") in the above-styled Docket. The City would respectfully show as follows:

**I. STATUS UPDATE**

Since filing its prior Status Update of November 21, 2019, the City has continued to work cooperatively with staff ("Staff") of the Public Utility Commission of Texas ("Commission") to address certain mapping issues arising from opt-out requests previously identified in this proceeding. While some such issues have been resolved since that time, the City and Staff remain in active communication to address those that remain. Based on such communications, the City anticipates that it will receive additional Requests for Information from Staff, intended to clarify and solicit the remaining information necessary for this proceeding to be remanded to the Commission for final approval of the above-referenced application.

The City has also communicated with Staff concerning this Status Update, and it is the City's understanding that Staff does not oppose this report to the Administrative Law Judge ("ALJ") advising her of the status of the case.

## II. CONCLUSION AND PRAYER

For the above-stated reasons, the City respectfully requests that the ALJ accept this Status Update and grant all other relief to which the City is entitled.

Respectfully submitted,

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

816 Congress Avenue, Suite 1900  
Austin, Texas 78701  
(512) 322-5800  
(512) 472-0532 (Fax)



---

DAVID J. KLEIN  
State Bar No. 24041257  
dklein@lglawfirm.com

MARIS M. CHAMBERS  
State Bar No. 24101607  
mchambers@lglawfirm.com

**ATTORNEYS FOR THE CITY OF DAYTON**

### 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 3rd day of January, 2020 to the parties of record, in accordance with 16 Tex. Admin. Code § 22.74.



---

David J. Klein