



Control Number: 48372



Item Number: 8

Addendum StartPage: 0

DOCKET NO. 48372

RECEIVED

APPLICATION OF NUECES WATER §
SUPPLY CORPORATION FOR SALE, §
TRANSFER, OR MERGER OF §
CYNDIE PARK UNIT I WATER CO-OP §
FACILITIES AND CERTIFICATE §
RIGHTS IN NUECES COUNTY §

PUBLIC UTILITY COMMISSION

2018 JUL 11 AM 9:02

PUBLIC UTILITY COMMISSION
OF TEXAS FILING CLERK

MOTION TO WITHDRAW APPLICATION

Nueces Water Supply Corporation ("Nueces WSC") files this Motion to Withdraw Application filed in this Docket and in support thereof would respectfully show as follows:

Nueces WSC filed an Application for Sale, Transfer, or Merger with the Public Utility Commission of Texas ("PUC") on May 15, 2018 to request all certificate rights of Cyndie Park Unit I Water Coop ("CPI"). The PUC Staff's Recommendation on Administrative Completeness filed on June 13, 2018 noted that an application for a sale, transfer, or merger requires a signed contract, bill of sale or other agreement between the two utilities, and Nueces WSC does not have any agreement with CPI due to the fact that no representative of CPI can be located. The Administrative Law Judge's Order No. 2 filed on June 15, 2018 subsequently deemed Nueces WSC's application incomplete and deficient pursuant to the PUC Staff's recommendation.

Counsel for Nueces WSC has conferred with PUC Attorney Heath Armstrong who has no objection to this Motion.

Therefore, Nueces WSC respectfully requests that the Administrative Law Judge grant this Motion to Withdraw Application in order to allow Nueces WSC to file the proper application to request the certificate rights of CPI.

Respectfully submitted,

WILLATT & FLICKINGER, PLLC
Attorneys at Law
12912 Hill Country Blvd., Suite F-232
Austin, Texas 78738
Telephone: (512) 476-6604
Telecopier: (512) 469-9148

By: 


Bill Flickinger
State Bar No. 07149050
bflickinger@wfaustin.com

Matthew W. McPhail
State Bar No. 24074692
mmcphail@wfaustin.com

ATTORNEYS FOR NUECES WATER SUPPLY
CORPORATION

CERTIFICATE OF SERVICE

I hereby certify that on July 9, 2018, the foregoing document was served on all parties of record in this proceeding in accordance with Texas Administrative Code § 22.74.



Bill Flickinger