



Control Number: 48714



Item Number: 13

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March 12, 2019

Via US Postal Service Overnight Priority Express Mail
Filing Clerk
Public Utilities Commission of Texas
1701 North Congress Avenue
Austin, Texas 78711-3326

RE: Docket No. 48714 - Application Of The City Of Edinburg Public Utility Commission To Amend A Certificate Of Convenience And Necessity Under Water Code §13.255 And Decertify A Portion Of North Alamo Water Supply Corporation's Service Area In Hidalgo County

Dear Clerk:

Enclosed, please find the original and ten (10) copies of the City of Edinburg's MOTION FOR 2ND EXTENSION OF TIME FOR CITY OF EDINBURG TO FILE A RESPONSE TO ORDER NO. 4 FINDING APPLICATION INCOMPLETE; ESTABLISHING AN OPPORTUNITY TO CURE; AND WARNING THAT A FUTURE FAILURE TO CURE MAY LEAD TO DISMISSAL FOR WANT OF PROSECUTION in connection with the referenced Application of the City of Edinburg Public Utility Commission to Amend a Certificate of Convenience and Necessity Under Water Code §13.255 and Decertify a Portion of North Alamo Water Supply Corporation's Service Area In Hidalgo County. The Motion was filed in the PUC filing system under Tracking No. THYA325K.

Should you have any questions or require additional information in connection with this filing, please contact our offices at your earliest convenience.

Thank you for your attention to this matter.

Sincerely,


Omar Ochoa
City Attorney

cc: Richard W. Fryer
Attorney for North Alamo Water Supply Corporation

Control Number: 48714

Filing Party: Omar Ochoa

Tracking Code: THYA325K

Type: PLEADINGS

Documents:

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Total Number of Pages: 2

No Addendum:

Submission Method: FTP (321 KB)

Submitted By:

CITY OF EDINBURG

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Version 4.07

3/12/2019 9:22:11 AM

Tracking Number

THYA325K

PUC DOCKET NO. 48714

APPLICATION OF THE CITY OF EDINBURG TO AMEND A CERTIFICATE OF CONVENIENCE AND NECESSITY UNDER WATER CODE §13.255 AND DECERTIFY A PORTION OF NORTH ALAMO WATER SUPPLY CORPORATION'S SERVICE AREA IN HIDALGO COUNTY	§ PUBLIC UTILITY COMMISSION § § OF TEXAS § § § §
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**MOTION FOR 2ND EXTENSION OF TIME FOR
CITY OF EDINBURG TO FILE A RESPONSE TO ORDER NO. 4
FINDING APPLICATION INCOMPLETE; ESTABLISHING AN OPPORTUNITY TO
CURE; AND WARNING THAT A FUTURE FAILURE TO CURE MAY LEAD TO
DISMISSAL FOR WANT OF PROSECUTION**

TO THE HONORABLE COMMISSION:

COMES NOW, CITY OF EDINBURG, Petitioner, in the above-entitled and numbered cause, and files this its **MOTION FOR EXTENSION OF TIME FOR CITY OF EDINBURG TO FILE A RESPONSE TO ORDER NO. 4 FINDING APPLICATION INCOMPLETE; ESTABLISHING AN OPPORTUNITY TO CURE; AND WARNING THAT A FUTURE FAILURE TO CURE MAY LEAD TO DISMISSAL FOR WANT OF PROSECUTION**, and would show unto the Court as follows

I.

1. Petitioner requested an extension of thirty calendar days from February 11, 2019 to March 13, 2019, for the City of Edinburg to file a response to Order No. 4 and was granted an extension pursuant to Order No. 5. North Alamo Water Supply Corporation and the City of Edinburg have discussed the mapping deficiencies and the issues relating to the written notice of its intent to provide service in annexed or incorporated area and the agreement between Edinburg and North Alamo supporting the transfer of water service areas, but need more time to reach an acceptable compromise and to coordinate the mapping issues with the other parties involved in this matter.

2. Petitioner believes that the requested extension will provide the Parties sufficient time to discuss the matter and clarify mapping issues, and the parties will make every effort to do so expeditiously.

3. Counsel for all other Parties have been contacted regarding this motion and are not opposed to the filing of this motion.

III.

Prayer

WHEREFORE, PREMISES CONSIDERED, Petitioner, **CITY OF EDINBURG**, urges the Court requests that this Court grant this Motion for Extension of Time, extending the time to respond to Order No. 5 from March 13, 2019 to March 27, 2019 for the City of Edinburg, and extend the time for PUC Staff to file a supplemental recommendation regarding administrative completeness, along with a proposed procedural schedule, if appropriate, from April 12, 2019 to April 26, 2019.

Respectfully submitted,

/s/ Omar Ochoa

Omar Ochoa, Attorney for Petitioner

Texas Bar No. 24079813

CITY OF EDINBURG

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DOCKET NO. 48714

CERTIFICATE OF SERVICE

I certify that a copy of this document will be served on all parties of record on March 12, 2019 in accordance with 16 TAC § 22.74.

/s/ Omar Ochoa

Omar Ochoa