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PUC DOCKET NO. 48714  
PUBLIC UTILITY COMMISSION  
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**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 EXTENSION OF TIME FOR CITY OF EDINBURG  
TO FILE A RESPONSE TO ORDER NO. 8 FINDING APPLICATION INCOMPLETE  
INCOMPLETE AND DEFICIENT; ESTABLISHING AN OPPORTUNITY TO CURE;  
AND DISCUSSING STAFF'S MOTION TO DISMISS**

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**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. 8 FINDING APPLICATION INCOMPLETE INCOMPLETE AND DEFICIENT; ESTABLISHING AN OPPORTUNITY TO CURE; AND DISCUSSING STAFF'S MOTION TO DISMISS**, and would show unto the Court as follows

**I.**

1. Petitioner is requesting an extension of thirty calendar days from July 26, 2019 August 26, 2019, for the City of Edinburg to file a response to Order No. 8. 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. There has been no previous extension requested to extend the time for the City of Edinburg to respond to Order No. 8.

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

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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. 8 from July 26, 2019 to August 26, 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 August 26, 2019 to September 26, 2019.

Respectfully submitted,

/s/ Omar Ochoa

Omar Ochoa, Attorney for Petitioner

Texas Bar No. 24079813

**CITY OF EDINBURG**

415 W. University Dr.

Edinburg, TX 78539

Telephone: (956) 388-8208

Facsimile: (956) 292-2113

omarochoa@cityofedinburg.com

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**CERTIFICATE OF SERVICE**

I certify that a copy of this document will be served on all parties of record on July 25, 2019 in accordance with 16 TAC § 22.74.

/s/Omar Ochoa

Omar Ochoa

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