



Control Number: 48714



Item Number: 21

Addendum StartPage: 0

RECEIVED

2019 JUL 29 AM 9:35 PUC DOCKET NO. 48714

PUBLIC UTILITY COMMISSION
FILING CLERK

APPLICATION OF THE CITY OF EDINBURG	§ PUBLIC UTILITY COMMISSION
TO AMEND A CERTIFICATE OF	§
CONVENIENCE AND NECESSITY UNDER	§ OF TEXAS
WATER CODE §13.255 AND DECERTIFY	§
A PORTION OF NORTH ALAMO WATER	§
SUPPLY CORPORATION'S SERVICE AREA IN	§
HIDALGO COUNTY	§

**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**

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.

21
~~21~~

6

7

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

DOCKET NO. 48714

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

