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PUC DOCKET NO. 48714

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. 11 FINDING APPLICATION INCOMPLETE
INCOMPLETE AND DEFICIENT; AND ESTABLISHING AN OPPORTUNITY TO CURE**

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. 11 FINDING APPLICATION INCOMPLETE INCOMPLETE AND DEFICIENT AND ESTABLISHING AN OPPORTUNITY TO CURE**, and would show unto the Court as follows:

I.

1. Petitioner is requesting an extension of thirty calendar days from January 9, 2020 for the City of Edinburg to file a response to Order No. 11.

2. On December 9, 2019, the Staff of the Public Utility Commission of Texas ("Staff"), identified deficiencies in the Application. Specifically, Staff determined that the agreement between the City of Edinburg (the "City") and North Alamo Water Supply Corporation ("North Alamo") documenting the acreage to be transferred did not match the revised map filed on October 25, 2019. The City and North Alamo have discussed the deficiency identified and will remedy it with a revised agreement. However, the governing bodies of both entities will not be able to ratify any revised agreement before the current January 9, 2020 deadline.

3. Petitioner believes that the requested extension will provide the Parties sufficient time to resolve the deficiency, and the parties will make every effort to do so expeditiously.

4. There has been no previous extension requested to extend the time for the City of Edinburg to respond to Order No. 11.

5. 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. 11 from January 9, 2020 to February 10, 2020 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 February 10, 2020 to March 11, 2020.

Respectfully submitted,

/s/ Omar Ochoa

Omar Ochoa, Attorney for Petitioner

Texas Bar No. 24079813

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CERTIFICATE OF SERVICE

I certify that a copy of this document will be served on all parties of record on January 3, 2020 in accordance with 16 TAC § 22.74.

/s/Omar Ochoa

Omar Ochoa

