



Control Number: 48791



Item Number: 40

Addendum StartPage: 0

DOCKET NO. 48791

**APPLICATION OF PENDLETON
HARBOR WATER SUPPLY
CORPORATION AND G-M WATER
SUPPLY CORPORATION FOR SALE,
TRANSFER, OR MERGER OF
FACILITIES AND CERTIFICATE
RIGHTS IN SABINE COUNTY**

§
§
§
§
§
§
§

PUBLIC UTILITY COMMISSION

OF TEXAS

RECEIVED

2019 OCT 15 AM 10:53

FILED

COMMISSION STAFF'S UNOPPOSED REQUEST FOR EXTENSION

COMES NOW the Staff of the Public Utility Commission of Texas (Staff), representing the public interest, and files this Unopposed Request for Extension and would show the following.

I. BACKGROUND

On October 17, 2018, G-M Water Supply Corporation (G-M WSC) and Pendleton Harbor Water Supply Corporation (Pendleton Harbor) (collectively, Applicants) filed an application for Sale, Transfer, or Merger of facilities and certificate rights in Sabine County, Texas, pursuant to Texas Water Code (TWC) § 13.301 and 16 Texas Administrative Code (TAC) § 24.239. Specifically, G-M seeks to acquire all of Pendleton Harbor's facilities and service area under water Certificate of Convenience and Necessity (CCN) No. 10737. In addition to the service area acquired from Pendleton Harbor, G-M seeks to add approximately 306 acres of uncertificated area to its water CCN No. 11393. The total requested area includes approximately 1,024 acres and 234 connections.

On September 11, 2019, Staff and Applicants filed an Amended Joint Motion to Admit Evidence and Proposed Order Approving Sale/Transfer to Proceed. On the same date, Staff filed an Amended Final Recommendation. Order No. 13, issued September 25, 2019, directed Staff to file a supplemental TWC § 13.246(c) analysis of the approximately 306 acres of uncertificated area G-M WSC has requested to add to its service area, along with a supplemental motion to admit evidence, by October 16, 2019. Therefore, this pleading is timely filed.

40

II. REQUEST FOR EXTENSION

Pursuant to 16 TAC § 22.4(b), Staff may request that the time allowed for filing any documents be extended for good cause. Order No. 13 directed Applicants to provide, upon request, the information necessary for Staff to conduct its supplemental TWC § 13.246(c) analysis. Staff issued discovery requesting the information needed to perform the analysis on October 4, 2019. Staff was subsequently made aware that counsel for G-M WSC never received the discovery, and Staff and G-M WSC have agreed to a response deadline of November 4, 2019. Accordingly, Staff requests that its deadline to file a supplemental analysis and supplemental motion to admit evidence be extended to November 18, 2019. Staff has contacted counsel for G-M WSC and a representative for Pendleton Harbor who stated that Applicants are not opposed to the requested extension.

III. CONCLUSION

Staff respectfully requests the issuance of an order granting its request and extending its deadline to file a supplemental TWC § 13.246(c) analysis and supplemental motion to admit evidence to November 18, 2019.

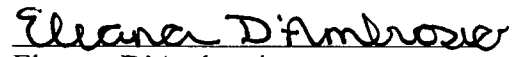
Dated: October 15, 2019

Respectfully submitted,

**PUBLIC UTILITY COMMISSION OF TEXAS
LEGAL DIVISION**

Margaret Uhlig Pemberton
Division Director

Karen S. Hubbard
Managing Attorney


Eleanor D'Ambrosio
State Bar No. 24097559
1701 N. Congress Avenue
P.O. Box 13326
Austin, Texas 78711-3326
(512) 936-7021
(512) 936-7268 (facsimile)
Eleanor.Dambrosio@puc.texas.gov

**DOCKET NO. 48791
CERTIFICATE OF SERVICE**

I certify that a copy of this document will be served on all parties of record on October 15, 2019 in accordance with 16 Texas Administrative Code § 22.74.


Eleanor D'Ambrosio