



Control Number: 48801



Item Number: 21

Addendum StartPage: 0

DOCKET NO. 48801

**PETITION OF T.J. BRADSHAW
CONSTRUCTION, LTD. TO AMEND
JONAH SPECIAL UTILITY
DISTRICT'S CERTIFICATES OF
CONVENIENCE AND NECESSITY
IN WILLIAMSON COUNTY BY
EXPEDITED RELEASE**

§
§
§
§
§
§
§

PUBLIC UTILITY COMMISSION

OF TEXAS

2019 JUL 10 PM 12:20
PUBLIC UTILITY COMMISSION
FILING CLERK

COMMISSION STAFF'S REQUEST FOR EXTENSION

COMES NOW the Staff of the Public Utility Commission of Texas (Staff), representing the public interest, and files this Commission Staff's Request for Extension:

I. BACKGROUND

On October 18, 2018, T.J. Bradshaw Construction, Ltd. (Petitioner) filed a petition with the Commission for expedited release from Jonah Special Utility District's (District) water Certificates of Convenience and Necessity (CCN) No. 10970 and sewer CCN No. 21053 pursuant to Texas Water Code (TWC) § 13.254(a-5) and 16 Texas Administrative Code (TAC) § 24.245(l). On October 23, 2018, Petitioner amended its application.

Petitioner asserts that it owns 256.33 acres of contiguous property in Williamson County (the Property), located within the boundaries of Jonah SUD's water and sewer CCNs. Petitioner also asserts that the Property is not receiving water or sewer service.

On June 7, 2019, the District filed a Motion to Dismiss, claiming that because the Commission did not approve the application within the 60 day statutory deadline, the Commission no longer possesses subject matter jurisdiction over the application.

On June 14, the Administrative Law Judge (ALJ) issued Order. No. 5, ordering Staff to respond to the District's Motion to Dismiss by June 21. This pleading is therefore timely filed.

I. STAFF'S REQUEST FOR EXTENSION

Staff respectfully requests that it be granted an extension until July 12, 2019, to respond to the District's Motion to Dismiss. Staff has conferred with the District and T.J. Bradshaw and neither party opposes Staff's request.

21

II. CONCLUSION

Staff respectfully requests that the ALJ issue an order consistent with Staff's request.

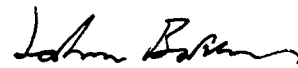
Date: June 18, 2019

Respectfully Submitted,

PUBLIC UTILITY COMMISSION OF TEXAS LEGAL DIVISION

Margaret Uhlig Pemberton
Division Director

Rachelle Nicolette Robles
Managing Attorney



Joshua Adam Barron
State Bar No. 24087146
1701 N. Congress Avenue
P.O. Box 13326
Austin, Texas 78711-3326
(512) 936-7235
(512) 936-7268 (facsimile)
Joshua.Barron@puc.texas.gov

DOCKET NO. 48801

CERTIFICATE OF SERVICE

I certify that a copy of this document will be served on all parties of record on June 18, 2019 in accordance with 16 TAC § 22.74.



Joshua Adam Barron