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PETITION BY THE CITY OF LORENA, §
 SPRING VALLEY WATER SUPPLY §
 CORPORATION, AND CITY OF WACO §
 FOR APPROVAL AND ENFORCEMENT §
 OF AGREEMENT DESIGNATING §
 SERVICE AREA UNDER TEXAS WATER §
 CODE §13.248 IN MCLENNAN COUNTY §

BEFORE THE PUBLIC

UTILITY COMMISSION

OF TEXAS

**CITY OF LORENA, CITY OF WACO, AND SPRING VALLEY WATER
 SUPPLY CORPORATION'S JOINT RESPONSE AND MOTION FOR
 EXTENSION OF TIME**

COMES NOW, City of Lorena, Texas ("Lorena"), City of Waco, Texas ("Waco") and Spring Valley Water Supply Corporation ("Spring Valley"), and hereby file this Joint Response and Motion for Extension of Time.

I. INTRODUCTION

On January 11, 2019, Lorena and Spring Valley, together with the City of Waco (together "Applicants"), filed a petition for approval of a service area contract under Texas Water Code §13.248.

On January 17, 2019, Order No 1 was issued and directed the Public Utility Commission's Staff to file comments on administrative completeness and address other procedural matters by February 11, 2019.

On February 4, 2019, the Public Utility Commission's ("Commission") Staff filed its First Request for Information with Lorena and with Spring Valley, and such responses were due on February 25, 2019, pursuant to 16 Tex. Admin. Code §22.144(c)(1).

On February 7, 2019, the Commission Staff filed its Motion for Extension of Time requesting an extension until March 26, 2019, to file its response to Order No. 1.

On February 8, 2019, Order No. 2 was issued which granted the Commission Staff's Motion but only until March 5, 2019, and also required the Applicants (Lorena, Spring Valley and Waco) and Commission Staff to file a recommendation regarding how to proceed with the application and a proposed procedural schedule on March 5, 2019.

On February 22, 2019, Lorena and Spring Valley filed an unopposed joint motion for an extension of time to respond to requests for information.

On February 25, 2019, Order No. 3 was issued granting deadlines in Order No. 2 to April 10, 2019.

On April 8, 2019, Commission Staff filed a Second Motion for Extension of Time,

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requesting until April 17, 2019, to file its response to Order No. 3.

On April 9, 2019, Order No. 4 was issued granting the extension of deadlines until April 17, 2019, together with Applicants and Commission Staff filing a recommendation regarding how to proceed with the application and a proposed procedural schedule.

On April 17, 2019, after 3:00 p.m., Applicants received Commission Staff's recommendation as to completeness, how to proceed and its proposed Procedural Schedule. Unfortunately, the Applicants had not been apprised of such recommendations, some of which are in direct contradiction to the Petition filed, as well as the Proposed Schedule. Thus, the Commission Staff's filing not only modifies Applicants' Petition but also the underlying contract between the Applicants, without conferring with any of the Applicants or their respective counsel. Further, it doesn't take into account whether Applicants may have objections to such action or whether each is able to obtain approval from their respective governing bodies, if acceptable.

II. MOTION FOR EXTENSION OF TIME

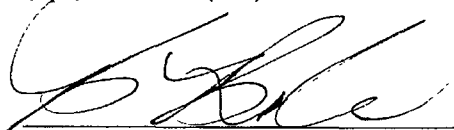
Pursuant to 16 Tex. Admin. Code §22.4(b), any party may request that the time allowed for the filing of any documents be extended for good cause. Here, the Applicants have not had sufficient time to digest, analyze, and respond to, or formulate a Proposed Procedural Schedule based upon this change in position or proposed modification to the Petition. Thus, good cause exists for an extension of time, as the Applicants need time to evaluate the change and obtain guidance from their respective governing bodies.

Lorena, on behalf of the Applicants, has attempted to reach out to Commission Staff's Legal Counsel to discuss and has no objection to it being continued until May 23, 2019.

Accordingly, Lorena, Waco, and Spring Valley file this Motion for Extension of Time to respond and file a Proposed Procedural Schedule until May 23, 2019.

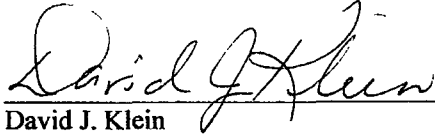
Respectfully submitted,

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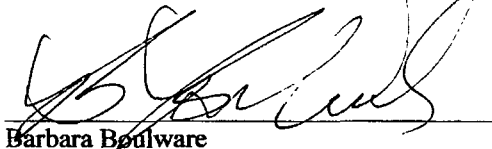
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permission
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CERTIFICATE OF SERVICE

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




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