



Control Number: 49277



Item Number: 33

Addendum StartPage: 0



DOCKET NO. 49277

**APPLICATION OF THE CITY OF
FORT WORTH FOR A SEWER
CERTIFICATE OF CONVENIENCE
AND NECESSITY IN TARRANT,
DENTON, WISE AND PARKER
COUNTIES** §
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**BEFORE THE
PUBLIC UTILITY COMMISSION
OF TEXAS**

CITY OF FORT WORTH’S SECOND SUPPLEMENT TO AMENDED APPLICATION

COMES NOW, the City of Fort Worth, Texas (the “City”), by and through its undersigned attorneys of record, and files this “Second Supplement to Amended Application.”

In support thereof, the City would show as follows:

I. BACKGROUND

On March 1, 2019, the City filed an application with the Public Utility Commission of Texas (the “Commission”) to obtain a sewer Certificate of Convenience and Necessity (“CCN”) in Tarrant, Denton, Wise, and Parker Counties (the “Application”). The City amended the Application on October 16, 2019 (the “Amended Application”). On December 20, 2019, the Administrative Law Judge (“ALJ”) issued Order No. 9 in this Docket, finding the Amended Application administratively incomplete, and ordering the City to provide certain supplemental information requested by Commission Staff. The City timely supplemented the Amended Application on February 20, 2020. On March 24, 2020, in accordance with the recommendation of Commission Staff, the ALJ issued Order No. 11, again finding the Amended Application administratively incomplete, and requiring the City to provide supplemental information on or before April 20, 2020. Specifically, the ALJ ordered the City to provide the following additional documentation identified in a March 16, 2020 “PUC Interoffice Memorandum” (“Staff’s Memo”):

- “revised general location maps identifying only the requested area, in reference to the nearest county boundary, city, or town;” and
- “revised detailed maps identifying only the requested area, in reference to verifiable man-made and natural landmarks, such as roads, rivers, and railroads.”

On April 20, 2020 the City and Commission Staff filed an “Agreed Motion for Extension of Time to Supplement the Application.” The ALJ issued Order No. 12 on April 21, 2020, granting the extension, and ordering the City to supplement the Amended Application on or before May 20, 2020. Therefore, this Second Supplement is timely filed.

II. SUPPLEMENT TO AMENDED APPLICATION

In accordance with Order No. 12, the City hereby supplements its Amended Application with additional mapping content responsive to the requests in Staff’s Memo. Specifically, the City submits the following:

Attachment A: General location maps identifying only the requested CCN areas in reference to the nearest county boundary, city, or town.

Attachment B: Detailed maps identifying only the requested CCN areas in reference to verifiable man-made and natural landmarks, such as roads, rivers, and railroads.

Attachment C: A cd-rom containing digital data for each polygon of the requested CCN area, provided as a single polygon record, in a shapefile (SHP) format. The label for each polygon of the requested CCN area corresponds to the key maps provided in Attachments A and B.

III. CONCLUSION

The City of Forth Worth respectfully requests that the Commission approve its Amended Application and grant all other and further relief to which it may be entitled.

Respectfully submitted,

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ATTORNEYS FOR THE CITY OF FORT
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CERTIFICATE OF SERVICE

I hereby certify that a copy of the foregoing document was transmitted by fax, hand-delivery and/or regular, first class mail on this 19th day of May, 2020 to the parties of record.



David J. Klein