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PETITION BY OUT OF DISTRICT §
RATEPAYERS APPEALING THE §
WATER RATES ESTABLISHED BY §
THE EL PASO WATER CONTROL §
AND IMPROVEMENT DISTRICT NO. 4 §

PUBLIC UTILITY COMMISSION
OF TEXAS

JUN -3 AM 9:16
PUBLIC UTILITY COMMISSION
FILING CLERK

**EL PASO COUNTY WATER CONTROL AND IMPROVEMENT DISTRICT
NO. 4'S UNOPPOSED REQUEST FOR EXTENSION OF TIME TO OBJECT AND
RESPOND TO COMMISSION STAFF'S SECOND REQUEST FOR INFORMATION**

COMES NOW, El Paso Water Control and Improvement District No. 4 ("District"), and files this Request for Extension of Time to Object and Respond to Commission Staff's ("Staff") Second Request for Information, and would respectfully show as follows:

I. BACKGROUND

On March 22, 2019, out-of-district ratepayers ("ratepayers") of the El Paso Water Control and Improvement District No. 4 (the "District") filed a petition contesting a rate action that was effective January 1, 2019, and other rate differentials.

Counsel of Record for the District received the Commission staff's second request for information directed to the District after 3:00 PM CDT on Friday, May 24, 2019. Accordingly, this discovery request is considered to have been received on Monday, May 27, 2019. The second request for information is comprised of seventeen questions, some with sub-questions. The District's current deadline to object to this discovery request is June 6, 2019, and its current deadline to otherwise respond is June 17, 2019.

II. REQUEST FOR EXTENSION

Pursuant to 16 TEX. ADMIN. CODE § 22.4(b), the District may request that the time allowed for filing any documents be extended for good cause. To properly and adequately file its objections and responses to Staff's second request for information, the District staff will have to locate, review, and prepare for submission all responsive documents. In addition, District management

and counsel will need to confer to determine whether to object to the discovery (or any portion) and to prepare and file any such objection. As a result, the District requests the following deadline extensions:

1. Deadline to file Objections to Second Request for Information: June 17, 2019,
2. Deadline to file Responses to Second Request for Information: July 8, 2019.

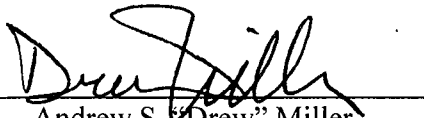
III. THIS REQUEST IS UNOPPOSED

On May 29, 2019, counsel for the District discussed the relief sought herein with the Staff's, Creighton R. McMurray, and he did not express any objections to the requested extension of time. Jennifer Richards, counsel for petitioners, is also unopposed to this request. This request is not caused by neglect, indifference, or lack of diligence. Therefore, the District requests that the ALJ find good cause to extend the District's deadline as requested above.

IV. PRAYER

The District respectfully request the entry of an order granting its request and extending the deadlines to object and respond to the Staff's second request for inform


Respectfully submitted,

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ATTORNEYS FOR EL PASO
COUNTY WATER CONTROL
AND IMPROVEMENT DISTRICT
NO. 4

CERTIFICATE OF SERVICE

I hereby certify that I have served or will serve a true and correct copy of the foregoing document via hand delivery, facsimile, electronic mail, overnight mail, U.S. mail and/or Certified Mail/Return-Receipt Requested to all parties on this 30th day of May, 2019.


Andrew S. "Drew" Miller