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DOCKET NO. 49367

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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 PUBLIC UTILITY COUNCIL OF TEXAS FILING CLERK

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

COMES NOW, El Paso Water Control and Improvement District No. 4 ("District"), and files this Request for Extension of Time to Respond to Commission Staff's First 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. On March 26, 2019, the Texas Public Utility Commission ("Commission") issued Order No. 1 requiring certain responses and recommendations from the Commission's staff and the District, all of which are due by April 22, 2019. The District intends to file a response to the ratepayers' petition, along with recommendations on how to proceed and a proposed procedural schedule by April 22, 2019.

On April 3, 2019 the Commission's staff sent its first request for information to the District. The request for information is comprised of five sub-questions. The District received that request on April 9, 2019. The District's deadline to respond is April 23, 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. Currently, the District is in the process preparing its response to the ratepayers' petition, and its recommendations on how to proceed and

proposed procedural schedule, all of which are due on April 22, 2019. Moreover, in order to properly and adequately respond to the Commission staff's request for information, the District will have to locate, review, and then prepare for submission the information and documents responsive to the request. As such, the April 22, 2019, deadline to file a response to the ratepayers' petition and recommendations on how to proceed, and procedural schedule, coupled with the April 23, 2019, deadline to respond to the request for information are untenable. Consequently, the District requests the following extension of time:

District's responses to Commission staff's first request for information will be due on April 29, 2019.

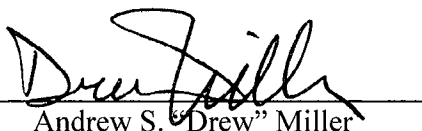
III. THIS REQUEST IS UNOPPOSED

On April 17, 2019, counsel for the District discussed the relief sought herein with the counsel for Commission staff, 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 deadline to respond to the Commission's Staff's First Request for Information to April 29, 2019.

Respectfully submitted,

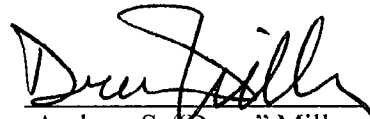
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ATTORNEYS FOR EL PASO
COUNTY WATER CONTROL
AND IMPROVEMENT DISTRICT
NO. 4

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 18th day of April, 2019.


Andrew S. "Drew" Miller