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DOCKET NO. 49386

APPLICATION OF LAS LOMAS §
MUNICIPAL UTILITY DISTRICT NO. §
4A OF KAUFMAN COUNTY, §
FORMERLY KNOWN AS LAS LOMAS §
MUNICIPAL UTILITY DISTRICT NO. 4 §
OF KAUFMAN COUNTY AND LAS §
LOMAS MUNICIPAL UTILITY §
DISTRICT NO. 4B OF KAUFMAN §
COUNTY FOR SALE, TRANSFER, OR §
MERGER OF SEWER FACILITIES §
AND CERTIFICATE RIGHTS IN §
KAUFMAN COUNTY

PUBLIC UTILITY COMMISSION

OF TEXAS

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PUBLIC UTILITY COMMISSION
FILING CLERK

MOTION FOR EXTENSION OF TIME

COMES NOW, Las Lomas Municipal Utility District No. 4A of Kaufman County (formerly, Las Lomas Municipal Utility District No. 4 of Kaufman County) and Las Lomas Municipal Utility District No. 4B of Kaufman County (collectively, the “Applicants”), and files this Unopposed Motion for Extension of Time in the above-referenced proceeding, and in support thereof, respectfully shows the following:

I. BACKGROUND

On March 28, 2019, Applicants submitted an application for approval of a sale, transfer, or merger of sewer facilities and certificate rights in Kaufman County.

On April 3, 2019, the Commission Administrative Law Judge (the “ALJ”) issued Order No. 1, providing May 1, 2019 as the deadline for the Commission Staff to file comments on the administrative completeness of the application.

On May 1, the Commission Staff filed a Recommendation on Administrative Completeness and Proposed Procedural Schedule, including a memorandum from Roshan Pokhrel identifying certain deficiencies in the application content, financial and technical information.

On May 3, 2019, the ALJ issued Order No. 2, finding the application incomplete and deficient. In Order No. 2, the ALJ stated that the Applicants must supplement the application on or before May 31, 2019 to cure the deficiencies described in the May 1, 2019 memorandum by Roshan Pokhrel. Order No. 2 also provided July 1, 2019 as the Commission Staff's deadline to file a supplemental recommendation regarding the administrative completeness of the application, along with a proposed procedural schedule.

On June 3, 2019, the ALJ issued Order No. 3, extending the Applicants' deadline to supplement the application to June 21, 2019. Order No. 3 also provided July 22, 2019 as the Commission Staff's deadline to file a supplemental recommendation regarding the administrative completeness of the application.

On June 21, 2019, the Applicants filed Supplemental Information in Response to Commission Staff's Recommendation on Administrative Completeness, attempting to cure the deficiencies described in the May 1, 2019 memorandum by Roshan Pokhrel.

On July 22, 2019, the Commission Staff filed a Supplemental Recommendation on Administrative Completeness and Proposed Procedural Schedule, including a memorandum from Roshan Pokhrel identifying additional deficiencies in the application content.

On July 23, 2019, the ALJ issued Order No. 4, finding the application incomplete and deficient. In Order No. 4, the ALJ stated that the Applicants must supplement the application on or before August 22, 2019 to cure the deficiencies described in the July 19, 2019 memorandum by Roshan Pokhrel. Order No. 4 also provided September 23, 2019 as the Commission Staff's deadline to file a supplemental recommendation regarding the administrative completeness of the application, along with a proposed procedural schedule.

II. APPLICANTS' MOTION FOR EXTENSION OF TIME

The Applicants hereby request a 21-day extension of time (new deadline would be September 12, 2019 for the Applicants) to supplement the application to cure the deficiencies detailed in the July 19, 2019 memorandum by Roshan Pokhrel. This request is not made for delay, but so the Applicants have additional time to receive proof that the Water Quality Discharge Permit No. 14803001 has been transferred to Las Lomas Municipal Utility District No. 4B of Kaufman County and finish preparing information necessary to resolve the remaining deficiencies specified in the memorandum.

III. PRAYER

For the reasons stated herein, counsel respectfully requests that the ALJ grant this Unopposed Motion for Extension of Time to respond to comply with the Commission Staff's recommendations and with Order No. 4.

Respectfully submitted,

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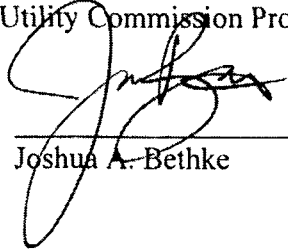
By: 

JOSHUA A. BETHKE
State Bar No. 24105465

ATTORNEYS FOR APPLICANTS

CERTIFICATE OF SERVICE

I hereby certify that a copy of this document will be served on all parties of record on August 22, 2019 in accordance with Public Utility Commission Procedural Rule 22.74.

A handwritten signature in black ink, appearing to read 'Joshua A. Bethke', is written over a horizontal line.

Joshua A. Bethke