

Control Number: 49387



Item Number: 6

Addendum StartPage: 0

### **DOCKET NO. 49387**

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 MUNICILA UTILITY § DISTRICT NO. 4B OF KAUFMAN § COUNTY FOR SALE, TRANSFER, OR **MERGER OF WATER FACILITIES** § AND CERTIFICATE RIGHTS IN Ş **KAUFMAN COUNTY** 

# AUBIACUTILITY COMMISSION

PUBLIC STILLITY OF THE KAS

## **UNOPPOSED 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 water 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.

(U

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.

### II. APPLICANTS' MOTION FOR EXTENSION OF TIME

The Applicants hereby request a 21-day extension of time (new deadline would be June 21, 2019 for the Applicants) to supplement the application to cure the deficiencies detailed in the May 1, 2019 memorandum by Roshan Pokhrel. This request is not made for delay, but so the Applicants have additional time to finish preparing the information necessary to resolve the 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. 2.

Respectfully submitted,

COATS ROSE, P.C.

14755 Preston Road, Suite 600

Dallas, Texas 75254

(972) 982-8454 (Telephone)

(972) 702-0662 (Facsimile)

jbethke@codtsrgsJ.com (Email)

Bv:

ÍOSHUA A. BETHKE

State Bar No. 24105465

ATTORNEYS FOR APPLICANTS

## **CERTIFICATE OF CONFERENCE**

On May 23, 2019, I contacted Alexander Petak, Commission Staff attorney, regarding the foregoing Motion for Extension of Time and was informed that the Commission Staff does not oppose this extension.

Joshua A. Bethke

## **CERTIFICATE OF SERVICE**

I hereby certify that a copy of this document will be served on all parties of record on May 29, 2019 in accordance with Public Utility Commission Procedural Rule 22.74.

Joshua A. Bethke