



Control Number: 49845



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**DOCKET NO. 49845**

**APPLICATION OF RIVER ACRES  
WATER SUPPLY CORPORATION TO  
AMEND ITS WATER CERTIFICATE  
OF CONVENIENCE AND NECESSITY  
IN NUECES COUNTY**

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**PUBLIC UTILITY COMMISSION  
OF TEXAS**

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**RIVER ACRES WATER SUPPLY CORPORATION'S REQUEST FOR EXTENSION**

**COMES NOW** the Applicant, River Acres Water Supply Corporation, and files this request for Extension and would show the following:

**I. BACKGROUND**

On August 12, 2019, River Acres Water Supply Corporation (RAWS) filed a petition to amend its water Certificate of Convenience and Necessity (CCN) No. 11084 in Nueces County. Specifically, RAWS is requesting a service area comprised of two separate tracts totaling 783 acres and including one current customer that RAWS is already serving. RAWS has received a request for service for a residential development that will include 81 homes and anticipates future residential development of one tract and future mixed used development of the other tract. Order No. 1, issued August 14, 2019, established a deadline of September 12, 2019, for Staff to file comments on the administrative completeness of the application and notice and to propose a procedural schedule for further processing of the application. On September 19, 2019, in a PUC Interoffice Memorandum, recommended that RAWS provide additional information including a written statement from the City of Corpus Christi permitting RAWS to provide water service in the requested area that overlaps their municipal boundaries. Order No. 4, issued November 20, 2019 established a deadline of December 13, 2019, for RAWS to supplement its Application to cure the deficiencies described in the September 19, 2019 Interoffice Memorandum. Order No. 5, issued December 11, 2019 established a deadline of March 13, 2020, for RAWS to supplement its Application to cure the deficiencies described in the September 19, 2019 Interoffice Memorandum. Therefore, this pleading is timely filed.

**II. REQUEST FOR EXTENSION**

Pursuant to 16 Texas Administrative Code (TAC) § 22.4(b), RAWS may request that the time allowed for filing any documents be extended for good cause. RAWS needs additional time to provide the additional information including a written statement from the City of Corpus Christi permitting RAWS to provide water service in the requested area that overlaps their municipal boundaries as requested in Order no. 5, including making a determination, if necessary, to amend the requested area to remove the portion that is within the City of Corpus Christi's municipal boundaries if RAWS cannot get the City of Corpus Christi's consent to Amend its CCN in that area. RAWS has been in negotiations with the City of Corpus Christi to resolve whether RAWS to either provide water service in a portion of the requested area or remove that portion from the original request. RAWS believes this resolution could be included in the next two (2) weeks. Accordingly, RAWS requests that its deadline to file a recommendation on the application and

address notice requirements be extended to April 13, 2020. RAWS has contacted Eleanor D'Ambrosio, attorney for the Legal Division of the PUC to discuss the requested extension and had not received any objection to this proposed request at the time of this filing.

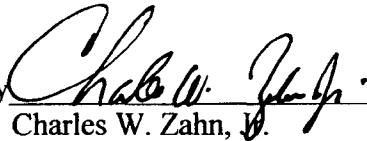
### III. CONCLUSION

RAWS respectfully requests the issuance of an order granting RAWS request and extending the deadline for RAWS to amend its Application to cure the deficiencies described in the September 19, 2019 Interoffice Memorandum referenced in Order No. 5 to April 13, 2020.

Dated: March 9, 2020

Respectfully Submitted,

**RIVER ACRES WATER SUPPLY  
CORPORATION**

By  \_\_\_\_\_  
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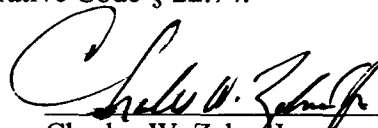
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Attorney for River Acres Water Supply  
Corporation

**DOCKET NO. 49845  
CERTIFICATE OF SERVICE**

I certify that a copy of this document will be swerved on all parties of record March 9, 2020, in accordance with 16 Texas Administrative Code § 22.74.

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Charles W. Zahn, Jr.