



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. Order No. 6, issued March 12, 2020, established a deadline of April 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. 6, 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 has had meetings scheduled with representatives of the City of Corpus Christi, including Mr. Peter Zaroni, its City Manager, two (2) times over the last month that have been canceled because of the City of Corpus Christi's leadership responding to the COVID-19 pandemic in the Texas Coastal Bend. That included outfitting the City of Corpus Christi and the representatives of RAWs with the means to conduct meetings through teleconferencing or video conferencing. Representatives of RAWs, including the undersigned, were able to meet with representatives of the City of Corpus Christi, including Mr. Zaroni, this date and have reached a tentative agreement with the City of Corpus Christi to obtain the city's consent to the proposed extension of RAWs CCN pending before the Commission. RAWs believes this consent could be concluded 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 May 13, 2020. RAWs has contacted Mr. Richard Nemer, 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.

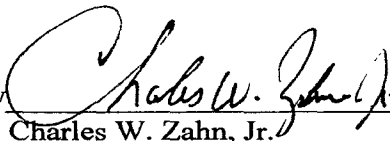
III. CONCLUSION

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 May 13, 2020.

Dated: April 6, 2020

Respectfully Submitted,

**RIVER ACRES WATER SUPPLY
CORPORATION**

By 

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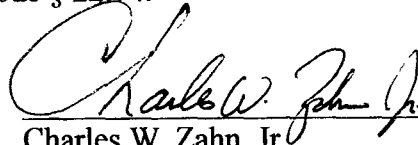
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Attorney for River Acres Water Supply
Corporation

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CERTIFICATE OF SERVICE

I certify that a copy of this document will be served on all parties of record April 6, 2020,
in accordance with 16 Texas Administrative Code § 22.74.



Charles W. Zahn, Jr.