



Control Number: 49891



Item Number: 5

Addendum StartPage: 0

APPLICATION OF MUSTANG
SPECIAL UTILITY DISTRICT TO
AMEND ITS CERTIFICATES OF
CONVENIENCE AND NECESSITY
IN DENTON COUNTY

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BEFORE THE
PUBLIC UTILITY COMMISSION

OF TEXAS

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**MUSTANG SUD'S RESPONSE TO COMMISSION STAFF'S
RECOMMENDATION ON ADMINISTRATIVE COMPLETENESS**

COMES NOW, Mustang Special Utility District ("Mustang SUD") and files this Response to Commission Staff's Recommendation on Administrative Completeness in accordance with PUC Order No. 2 dated September 27, 2019. In support thereof, Mustang SUD would respectfully show as follows:

I. BACKGROUND

Mustang SUD filed an application to amend its water Certificate of Convenience and Necessity ("CCN") No. 11856 and sewer CCN No. 20930 on August 23, 2019. On September 23, 2019, Commission Staff recommended that the application be found administratively incomplete and identified deficiencies in the application content and mapping. PUC Order No. 2 required Mustang SUD to respond to Commission Staff's recommendation on administrative completeness by October 23, 2019. This response is timely filed.

II. RESPONSE TO RECOMMENDATIONS

Mustang SUD responds to the recommendations as follows:

A. Application Content

The Commission Staff stated that the requested areas overlap the City of Celina and Town of Little Elm, which requires written consent from the cities allowing Mustang SUD to provide retail water service within their municipal boundaries. According to 16 TAC 24.233(c)(1), written consent to provide service within the municipal boundaries is only required when the municipality has a

population of 500,000 or more. The populations of City of Celina and Town of Little Elm are far fewer than 500,000 people so written consent is not necessary or required from them in order for Mustang SUD's application to be declared administratively complete.

B. Mapping Content

Attachment "A" to this response contains CD with the digital data for the request areas provided in shapefile format, which resolve any gaps and overlaps identified by the PUC staff. We have confirmed with Tracy Montes, PUC GIS Specialist has reviewed the shapefiles and confirm the update data looks sufficient.

III. CONCLUSION

Based on the supplemental information being provided, Mustang SUD respectfully recommends that the application be found administratively complete at this time.

Respectfully submitted,

JACKSON WALKER L.L.P.

By: 

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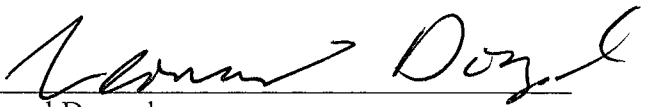
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ATTORNEYS FOR MUSTANG SPECIAL
UTILITY DISTRICT

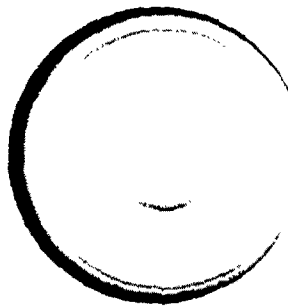
CERTIFICATE OF SERVICE

I hereby certify that on the 23rd day of October, 2019, a copy of this document will be served on all parties of record in accordance with 16 TAC § 22.74.



Leonard Dougal

**PUC Docket No. 49891
Mustang SUD**



**Response to PUC Staff
Recommendations - Shape Files
Oct. 23, 2019**