



Control Number: 50543



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**DOCKET NO. 50543**

**APPLICATION OF SP UTILITY  
COMPANY, INC. TO AMEND ITS  
CERTIFICATE OF CONVENIENCE  
AND NECESSITY AND FOR DUAL  
CERTIFICATION WITH DREW T.  
SPENCER D/B/A CYPRESSWOOD  
ESTATES IN MONTGOMERY  
COUNTY**

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**PUBLIC UTILITY COMMISSION**

**BEFORE THE**

**OF TEXAS**

**SP UTILITY COMPANY, INC.'s SECOND REQUEST FOR EXTENSION**

COMES NOW, SP Utility Company, Inc. (hereinafter, "SP Utility"), and files this Second Request for Extension in the above-docketed case, and would respectfully show the following:

**I. BACKGROUND**

On February 12, 2020, SP Utility filed an application to amend its water Certificate of Convenience and Necessity ("CCN") No. 12978 and for dual certification with Drew T. Spencer d/b/a Cypresswood Estates Water System. On March 12, 2020, the Staff of the Public Utility Commission of Texas ("Commission") filed their Recommendation that the application be deemed administratively incomplete. On March 18, 2020, the Commission Administrative Law Judge ("ALJ") issued Order No. 2, finding the application administratively incomplete and establishing deadlines and an opportunity for SP Utility to cure. After SP Utility supplemented its application on April 10, 2020, Commission Staff filed a Supplemental Recommendation and memorandum again finding the application incomplete. Order No. 3 established June 8, 2020 as the deadline for SP Utility to cure deficiencies. SP Utility filed a Request for Extension on June 5, 2020 seeking an additional sixty (60) days to comply with the Commission Staff's memorandum. Order No. 4 issued on June 12, 2020 granted the request and established a deadline to supplement the application of August 4, 2020. This request for a second extension is made prior to the August 4, 2020 deadline and is therefore timely filed.

## **II. SECOND REQUEST FOR EXTENSION**

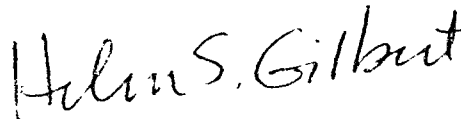
Commission Staff's May 8, 2020 memorandum recommended that SP Utility supplement its application by submitting proof that it had filed plans and specifications for its proposed new facility with the Texas Commission on Environmental Quality ("TCEQ"). Per Order No. 4, the deadline to do so is August 4, 2020. However, engaging an engineering firm to prepare (and actually prepare) plans and specifications - design of an entire new water system basically - has been more difficult and time-consuming than SP Utility originally anticipated. Despite that, SP Utility is confident the required submittal to TCEQ can be accomplished within the next thirty (30) days. Accordingly, SP Utility requests an additional extension to supplement its application by September 2, 2020. SP Utility has conferred with Commission Staff and they are unopposed to a thirty (30) day extension.

## **III. PRAYER**

WHEREFORE, PREMISES CONSIDERED, SP Utility respectfully prays that the Commission ALJ extend SP Utility's deadline to supplement its application to cure deficiencies noted by Commission Staff (proof of its TCEQ submittal) an additional thirty (30) days until September 2, 2020, and all other such relief to which it is entitled.

Respectfully submitted,

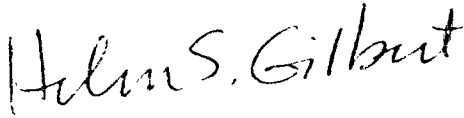
Randall B. Wilburn  
State Bar No. 24033342  
Helen Gilbert  
State Bar No. 00786263  
GILBERT WILBURN PLLC  
7000 North MoPac Expwy., Suite 200  
Austin, Texas 78731  
Telephone: (512) 494-5341  
Telecopier: (512) 472-4014



By: \_\_\_\_\_  
**ATTORNEYS FOR SP UTILITY COMPANY,  
INC.**

**CERTIFICATE OF SERVICE**

I hereby certify that I have served or will serve a true and correct copy of the foregoing document via electronic mail on all parties on the 31st day of July 2020.

  
By: \_\_\_\_\_  
Helen S. Gilbert