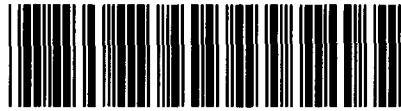




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DOCKET NO. 50200

APPLICATION OF UNDINE TEXAS, §
LLC AND UNDINE TEXAS §
ENVIRONMENTAL, LLC FOR §
AUTHORITY TO CHANGE RATES §

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OF TEXAS

**UNDINE TEXAS, LLC'S RESPONSE TO
OPUC'S FIRST REQUEST FOR INFORMATION NO. 1-13**

Undine Texas, LLC (Undine) files this Response to the First Request for Information (RFI) No. 1-13, filed by the Office of Public Utility Counsel (OPUC). The discovery request was received by Undine on February 18, 2020, and counsel for Undine and OPUC agreed to a one week extension for this response; therefore this response is timely filed. Pursuant to 16 Tex. Admin. Code (TAC) § 22.144(c)(2)(F), Undine agrees that this response may be treated as if it was filed under oath.

If a responsive document exceeds 99 pages, the response will indicate that the attachment is voluminous. Voluminous documents will be provided electronically, and pursuant to 16 TAC § 22.144(h)(2), the document will be made available for inspection at the offices of Undine's attorneys, Lloyd Gosselink Rochelle and Townsend, P.C., located at 816 Congress Avenue, Suite 1900, Austin, Texas 78701. Please call Hanna Campbell at 512-322-5871 during regular business hours, to make an appointment to review the documents.

Pursuant to 16 TAC § 22.144(h)(4), an index of the voluminous documents is provided, below.

VOLUMINOUS INDEX

1. Attachments to Undine's Response to OPUC RFI No. 1-13

No.	Date	Title or Description	Preparer or Sponsor	Page Range	No. of Pages
1-13	03/13/2020	OPUC 1-13 A – Undine Systems Costs.xlsx	Prepared by Benny Wilkinson; Sponsored by Donald J. Clayton	1-41	41
1-13	03/13/2020	OPUC 1-13 B – Original Cost Data.xlsx	Prepared by Benny Wilkinson; Sponsored by Donald J. Clayton	42-234	192

1874

Respectfully submitted,

**LLOYD GOSSELINK ROCHELLE
& TOWNSEND, P.C.**

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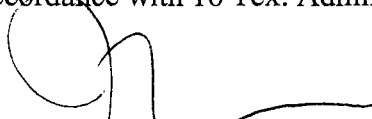
JAMIE L. MAULDIN

State Bar No. 24065694

ATTORNEYS FOR UNDINE TEXAS, LLC

CERTIFICATE OF SERVICE

I hereby certify that on March 13, 2020, a true and correct copy of the foregoing document has been served on all parties of record in accordance with 16 Tex. Admin. Code § 22.74.



JAMIE L. MAULDIN

DOCKET NO. 50200

**UNDINE TEXAS, LLC'S RESPONSE TO
OPUC'S FIRST REQUEST FOR INFORMATION NO. 1-13**

OPUC 1-13 Please reference the Direct Testimony of Donald J. Clayton, 8:21-23 and 10:21-22. Please provide the source documentation and summaries used by the Company from the previous system owners in developing the "original cost of acquired plant." To the extent regulatory approved rate base values are available for the acquired systems, please provide the Final Orders documenting these amounts.

RESPONSE: This response is VOLUMINOUS and will be provided on CD.

See Attachment OPUC 1-13 A – Undine Systems Costs.xlsx for the source documentation and summaries used by Donald J. Clayton in developing the "original cost of acquired plant."

See Attachment OPUC 1-13 B – Original Cost Data.xlsx for information provided by the seller to Undine on the date of acquisition.

Prepared by: Benny Wilkinson
Sponsored by: Donald J. Clayton

DOCKET NO. 50200
Application of Undine Texas, LLC
for Authority to Change Rates

March 13, 2020

UNDINE TEXAS, LLC's
Voluminous Attachments to
OPUC 1-13 A and 1-13 B