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

BEFORE THE PUBLIC UTILITY COMMISSION OF TEXAS

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

Undine Texas, LLC (Undine) files this Corrected 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.

This Corrected Response to OPUC's First Request for Information No. 1-13 should substitute Undine's Response to OPUC's First Request for Information No. 1-13 filed on Friday, March 13, 2020. In anticipation of office closure due to the novel coronavirus, the filing was made early and consequently contained incorrect information. This Corrected Response is not voluminous and will be filed electronically.

Respectfully submitted,

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/s/ Jamie L. Mauldin GEORGIA N. CRUMP State Bar No. 05185500

JAMIE L. MAULDIN State Bar No. 24065694

ATTORNEYS FOR UNDINE TEXAS, LLC

CERTIFICATE OF SERVICE

I hereby certify that on March 16, 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.

<u>/s/ Jamie L. Mauldin</u> JAMIE L. MAULDIN

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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: See Attachment OPUC 1-13 – Original Cost Data at Date of Acquisition.xlsx for the source documentation and information provided by the seller to Undine on the date of acquisition in developing the "original cost of acquired plant."

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