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DOCKET NO. 50251

APPLICATION OF JRM WATER LLC AND CSWR-TEXAS UTILITY OPERATING COMPANY, LLC FOR SALE, TRANSFER, OR MERGER OF FACILITIES AND CERTIFICATE RIGHTS IN VICTORIA COUNTY

PUBLIC UTILITY COMMISSION>

OF TEXAS

CSWR-TEXAS UTILITY OPERATING COMPANY, LLC'S RESPONSE TO ORDER NO. 2 AND FIRST SUPPLEMENT TO APPLICATION

CSWR-Texas Utility Operating Company, LLC ("CSWR Texas" or the "Company") submits this Response to Order No. 2 and First Supplement to its Application as required by Order No. 2 in this proceeding. The Company is supplementing its application in order to cure deficiencies described in Commission Staff's Recommendation on Administrative Completeness and Proposed Procedural Schedule ("Staff's Recommendation"), issued on December 18, 2019, and the memorandum of Nabaraj Pokharel. Order No. 2 required CSWR Texas to respond by January 16, 2020. Accordingly, this response is timely filed.

I. FIRST SUPPLEMENT TO CSWR TEXAS' APPLICATION

Staff's Recommendation identified the following deficiency in the Company's application:

Applicants must provide documentation from TCEQ showing CSWR is working with TCEQ towards a compliance agreement to allow CSWR time to come into compliance with the TCEQ violations listed for JRM Water, LLC once the sale is complete.

In order to cure this deficiency, the Company is providing the attached confidential Attachment A, which contains correspondence between CSWR Texas and TCEQ showing the Company is working with TCEQ towards a compliance agreement to allow the Company time to come into compliance with the TCEQ violations listed for JRM Water, LLC once the sale is complete.

II. DESIGNATION OF PROTECTED MATERIALS

The Company is providing this information confidentially because it contains transactional information related to other water or wastewater systems that have not been made public and are exempt from public disclosure under Tex. Gov't Code §§ 552.101, 552.104 and 552.110. The undersigned counsel for CSWR Texas has reviewed the information sufficiently to state in good faith that the information is exempt from public disclosure under the Public Information Act and merits the Protected Materials designation.

III. CONCLUSION

Based on the foregoing, and subject to Commission Staff's review and recommendation, CSWR-Texas requests issuance of an order finding the Company's application is sufficient and that it be granted such other relief to which it may show itself entitled.

Respectfully submitted,

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ATTORNEYS FOR CENTRAL STATES WATER RESOURCES, INC.

CERTIFICATE OF SERVICE

I hereby certify that on this 9th day of January 2020, a true and correct copy of the foregoing document was served on all parties of record in accordance with 16 Tex. Admin. Code § 22.74.

John Johnson