



Control Number: 50961



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**DOCKET NO. 50961**



**APPLICATION OF NERRO SUPPLY, §  
LLC AND UNDINE TEXAS §  
ENVIRONMENTAL, LLC FOR SALE, §  
TRANSFER OR MERGER OF §  
FACILITIES AND CERTIFICATE §  
RIGHTS IN CHAMBERS AND HARRIS §  
COUNTIES §**

**PUBLIC UTILITY COMMISSION  
OF TEXAS**

**COMMISSION STAFF'S SECOND REQUEST FOR INFORMATION  
TO NERRO SUPPLY, LLC AND UNDINE TEXAS ENVIRONMENTAL, LLC  
QUESTION NO. STAFF 2-1**

**COMES NOW** the Staff (Staff) of the Public Utility Commission of Texas (Commission), representing the public interest, and files this Commission Staff's Second Request for Information to Nerro Supply, LLC and Undine Texas Environmental, LLC Question No. Staff 2-1.

Staff requests that Nerro Supply, LLC (Nerro) and Undine Texas Environmental, LLC (Undine) provide the following information and answer the following questions under oath. The questions shall be answered in sufficient detail to fully present all of the relevant facts, within the time limit provided by the Presiding Officer or within 20 days, if the Presiding Officer has not provided a time limit. Please copy the question immediately above the answer to each question. These questions are continuing in nature, and, if there is a relevant change in circumstances, Nerro and Undine must submit an amended answer, under oath, as a supplement to its original answer. State the name of the witness in this cause who will sponsor the answer to the question and can vouch for the truth of that answer.

Dated: December 17, 2020

Respectfully submitted,

**PUBLIC UTILITY COMMISSION OF TEXAS  
LEGAL DIVISION**

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/s/ Merritt Lander  
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**CERTIFICATE OF SERVICE**

I certify that, unless otherwise ordered by the presiding officer, notice of the filing of this document was provided to all parties of record on December 17, 2020 in accordance with the Order Suspending Rules, issued in Project No. 50664.

/s/ Merritt Lander  
Merritt Lander

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**COMMISSION STAFF'S SECOND REQUEST FOR INFORMATION  
TO NERRO SUPPLY, LLC AND UNDINE TEXAS ENVIRONMENTAL, LLC  
QUESTION NO. STAFF 2-1**

**DEFINITIONS**

- 1) "Applicant," Nerro," or "you" refers to Nerro Supply, LLC and any person acting or purporting to act on its behalf, including, without limitation, attorneys, agents, advisors, investigators, representatives, employees or other persons.

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QUESTION NO. STAFF 2-1**

**INSTRUCTIONS**

- 1) Pursuant to 16 TAC § 22.144(c)(2), Staff requests that answers to the requests for information be made under oath.
- 2) Please copy the question immediately above the answer to each question. State the name of the witness in this cause who will sponsor the answer to the question and can vouch for the truth of the answer.
- 3) These questions are continuing in nature, and if there is a relevant change in circumstances, submit an amended answer, under oath, as a supplement to your original answer.
- 4) Words used in the plural shall also be taken to mean and include the singular. Words used in the singular shall also be taken to mean and include the plural.
- 5) The present tense shall be construed to include the past tense, and the past tense shall be construed to include the present tense.
- 6) If any document is withheld under any claim of privilege, please furnish a list identifying each document for which a privilege is claimed, together with the following information: date, sender, recipients or copies, subject matter of the document, and the basis upon which such privilege is claimed.
- 7) Pursuant to 16 TAC § 22.144(h)(4), if the response to any request is voluminous, please provide a detailed index of the voluminous material.
- 8) Staff requests that each item of information be made available as it is completed, rather than upon completion of all information requested.

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**COMMISSION STAFF'S SECOND REQUEST FOR INFORMATION  
TO NERRO SUPPLY, LLC QUESTION NO. STAFF 2-1**

**Staff 2-1** Please provide a statement regarding how violations for the Woodland Acres wastewater discharge permit shown in the Texas Commission on Environmental Quality (TCEQ) Central Registry database will be resolved by Undine Texas Environmental, LLC, or provide proof that these violations have been resolved.