

Control Number: 51003



Item Number: 38

Addendum StartPage: 0

DOCKET NO. 51003

§

§ §

§

2020 DEC 16 AM 9: 54

FUSCIONE LITTER TO THE TO THE PERSON OF LITTER TO THE PERSON OF THE PERSON OF

APPLICATION OF OAK HILL RANCH ESTATES WATER AND CSWR-TEXAS UTILITY OPERATING COMPANY, LLC FOR SALE, TRANSFER, OR MERGER OF FACILITIES AND CERTIFICATE RIGHTS IN GUADALUPE AND WILSON COUNTIES

PUBLIC UTILITY COMMISSION

OF TEXAS

BEFORE THE

CSWR-TEXAS UTILITY OPERATING COMPANY, LLC'S SECOND SUPPLEMENTAL DESIGNATION OF PROTECTED MATERIALS

Pursuant to the protective order entered in this proceeding,¹ CSWR-Texas Utility Operating Company, LLC ("CSWR Texas") is designating certain material provided in its second supplemental response to Staff's First Request for Information to CSWR Texas as highly sensitive. The undersigned counsel for CSWR Texas has reviewed the information sufficiently to state in good faith that this information is exempt from public disclosure under the Public Information Act and merits the Protected Materials designation.

CSWR Texas' Second Supplemental Attachment to Staff 1-1(a) has been designated as highly sensitive because the supplemental responsive document contains commercially sensitive financial and business operation information. The public disclosure of the information would cause substantial competitive harm to CSWR, LLC and its subsidiaries, including CSWR Texas. Any other entity that seeks to acquire water utilities in Texas and elsewhere could use the financial information to its competitive advantage, to the detriment of CSWR, LLC and its subsidiaries. Accordingly, the information contained in Second Supplemental Highly Sensitive Attachment Staff 1-1(a) is exempt from public disclosure under Tex. Gov't Code §§ 552.101, 552.104 and 552.110.

¹ Order No. 1 at 4 (Jul. 24, 2020).

Respectfully submitted,

L. Russell Mitten General Counsel Central States Water Resources, Inc. 1650 Des Peres Rd., Suite 303 St. Louis, MO 63131 (314) 380-8595 (314) 763-4743 (Fax)

Evan D. Johnson

State Bar No. 24065498

Kate Norman

State Bar No. 24051121

C. Glenn Adkins

State Bar No. 24103097

Coffin Renner LLP

1011 W. 31st Street

Austin, Texas 78705

(512) 879-0900

(512) 879-0912 (fax)

evan.johnson@crtxlaw.com

kate.norman@crtxlaw.com

glenn.adkins@crtxlaw.com

ATTORNEYS FOR CSWR, LLC

CERTIFICATE OF SERVICE

I hereby certify that on this 16th day of December 2020, notice of the filing of this document was provided to all parties of record via electronic mail in accordance with the Order Suspending Rules, issued in Project No. 50664.

Evan D. Johnson