

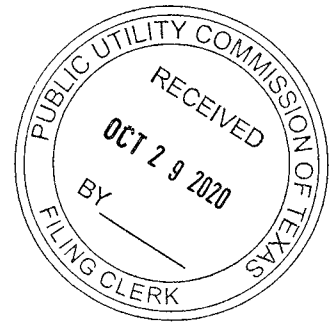


Control Number: 51089



Item Number: 20

Addendum StartPage: 0



DOCKET NO. 51089

**APPLICATION OF DONALD E. WILSON §
D/B/A QUIET VILLAGE II D/B/A QV §
UTILITY AND CSWR-TEXAS UTILITY §
OPERATING COMPANY, LLC FOR §
SALE, TRANSFER, OR MERGER OF §
FACILITIES AND CERTIFICATE §
RIGHTS IN HIDALGO COUNTY §**

**BEFORE THE
PUBLIC UTILITY COMMISSION
OF TEXAS**

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

Pursuant to the Commission’s standard protective order,¹ CSWR-Texas Utility Operating Company, LLC (“CSWR Texas”) is designating certain material provided in response to Staff’s First Request for Information to CSWR Texas as highly sensitive or confidential. 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’ Attachment to Staff 1-1 has been designated as confidential because it is an agreement between third parties that has been designated as confidential by the parties to the agreement. CSWR Texas’ Attachment to Staff 1-3(a) has been designated as highly sensitive and CSWR Texas’ Attachment to Staff 1-3(b) has been designated as confidential because each 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

¹ Concurrent with this filing, the Company has requested adoption of a protective order consistent with the Commission’s standard protective order approved in prior STM cases.

contained in Highly Sensitive Attachment Staff 1-3(a) and Confidential Attachment Staff 1-3(b) is exempt from public disclosure under Tex. Gov't Code §§ 552.101, 552.104 and 552.110.

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)

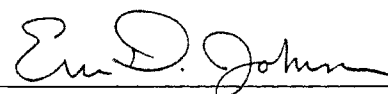


Evan D. Johnson
State Bar No. 24065498
Kate Norman
State Bar No. 24051121
C. Glenn Adkins
State Bar No. 24103097
Coffin Renner LLP
1011 W. 31st Street
Austin, Texas 78705
(512) 879-0900
(512) 879-0912 (fax)
evan.johnson@crtxlaw.com
kate.norman@crtxlaw.com
glenn.adkins@crtxlaw.com

ATTORNEYS FOR CSWR, LLC

CERTIFICATE OF SERVICE

I hereby certify that on this 29th day of October 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