



Control Number: 51544



Item Number: 14

Addendum StartPage: 0



**DOCKET NO. 51544**

**APPLICATION OF FRANKLIN WATER §  
SERVICE CO. LLC AND CSWR-TEXAS §  
UTILITY OPERATING COMPANY, LLC §  
FOR SALE, TRANSFER, OR MERGER §  
OF FACILITIES AND CERTIFICATE §  
RIGHTS IN LUBBOCK COUNTY §**

**PUBLIC UTILITY COMMISSION  
OF TEXAS**

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

Pursuant to the protective order entered in this proceeding,<sup>1</sup> 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(a) has been designated as highly sensitive and CSWR Texas’ Attachment to Staff 1-1(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 contained in Highly Sensitive Attachment Staff 1-1(a) and Confidential Attachment Staff 1-1(b) is exempt from public disclosure under Tex. Gov’t Code §§ 552.101, 552.104 and 552.110.

<sup>1</sup> Order No. 1 at 4 (Nov. 30, 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. 31<sup>st</sup> Street  
Austin, Texas 78705  
(512) 879-0900  
(512) 879-0912 (fax)  
[evan.johnson@crtxlaw.com](mailto:evan.johnson@crtxlaw.com)  
[kate.norman@crtxlaw.com](mailto:kate.norman@crtxlaw.com)  
[glenn.adkins@crtxlaw.com](mailto:glenn.adkins@crtxlaw.com)

**ATTORNEYS FOR CSWR, LLC**

**CERTIFICATE OF SERVICE**

I hereby certify that on this 4<sup>th</sup> day of January 2021, 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