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PUC DOCKET NO. 51979

PETITION BY SIG MAGNOLIA LP	§	BEFORE THE
FOR EXPEDITED RELEASE	§	
FROM WATER CCN NO. 11052	§	PUBLIC UTILITY COMMISSION
HELD BY DOBBIN PLANTERSVILLE	§	
WATER SUPPLY CORPORATION	§	OF TEXAS

DOBBIN PLANTERSVILLE WSC'S SUPPLEMENTAL RESPONSE TO SIG MAGNOLIA'S REQUESTS FOR INFORMATION

TO: SIG Magnolia LP, by and through its counsel of record, Emily W. Rogers, Bickerstaff, Heath Delgado Acosta, LLP, 3711 S. MoPac Expressway, Building One, Suite 300, Austin, Texas 78746.

Dobbin Plantersville Water Supply Corporation ("Dobbin Plantersville") files this its Supplemental Response to SIG Magnolia LP's ("SIG Magnolia") Requests for Information ("RFIs"), on the deadline extended by Order No. 9 (August 24, 2021). This supplemental response is timely filed. Dobbin Plantersville's General Manager and other staff remain ill as described in Dobbin Plantersville's Second Agreed Motion for Extension; therefore, it will be necessary to supplement the responses as soon as she has recovered and returned to work.

Dobbin Plantersville's written responses and responsive documents are attached hereto and incorporated by reference. Dobbin Plantersville's responses are made in the spirit of cooperation without waiving Dobbin Plantersville's right to contest the admissibility of any of this information. Pursuant to 16 Texas Administrative Code section 22.144(c)(2)(A), each response lists the preparer or person under whose direct supervision the response was prepared and the sponsoring witness, if any. Pursuant to Texas Administrative Code section 22.144(c)(2)(F), Dobbin Plantersville stipulates that its responses may be treated by all parties as if they were made under oath. For purposes of these responses, Respondent uses the same definitions set out in SIG Magnolia's RFIs. These responses will be supplemented when the General Manager recovers, and after that, as required by PUC rules.

Respectfully submitted,

MARY K. SAHS, P.C.

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ATTORNEY FOR DOBBIN PLANTERSVILLE WATER SUPPLY CORPORATION

CERTIFICATE OF SERVICE

The undersigned hereby certifies that a copy of Dobbin Plantersville WSC's Supplemental Response to SIG Magnolia's Request for Information was served on all parties of record in this proceeding on August 24, 2021, by filing on the Commission's Interchange Filing System and sending via email.

Mary K. Sahs

Mary K. Sahs

SUPPLEMENT RESPONSE TO SIG MAGNOLIA'S REQUESTS FOR INFORMATION NO. 3

RFI 3. Please provide Dobbin Plantersville's currently applicable capital improvement plan and most recently completed Master Plan.

SUPPLEMENTAL RESPONSE: A copy of Dobbin Plantersville's project plan for its water system in Montgomery County is attached as Exhibit RFI 3.

PREPARED AND SPONSORED BY: Steve Duncan

