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**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 SECOND 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 Second Supplemental Response to SIG Magnolia LP's ("SIG Magnolia") Requests for Information ("RFIs"), prior to the deadline requested in the Agreed Second Motion for Extension (September 2, 2021). This second supplemental response is timely filed. Dobbin Plantersville's General Manager has expired and other staff remain ill as described in Dobbin Plantersville's Third Agreed Motion for Extension; therefore, it will be necessary to supplement the responses as soon as other staff 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 as required by PUC rules.

Respectfully submitted,

**MARY K. SAHS, P.C.**

*Mary K. Sahs*

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Mary K. Sahs

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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 September 3, 2021, by filing on the Commission's Interchange Filing System and sending via email.

*Mary K. Sahs*

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Mary K. Sahs

**SUPPLEMENTAL RESPONSE TO SIG MAGNOLIA'S  
REQUEST FOR INFORMATION NO. 16**

**RFI 16.** Please provide invoices outlining the professional and legal fees incurred by the WSC associated with the decertification. Please continue to update request No. 16 during the pendency of the proceeding.

**RESPONSE:** As the parties agreed on July 29, the legal and professional fees are summarized. As of the end of July, the legal fees of Mary K. Sahs, P.C., associated with the decertification of SIG Magnolia are \$9,366.40. As of the end of June, the professional fees of Bleyl Engineering are \$7,447.50.

The legal fees of Mary K. Sahs, P.C., covering work done in August associated with the decertification of SIG Magnolia are \$3,618.14. The professional fees of Bleyl Engineering for services rendered during July and August are \$2,290.00.

**PREPARED AND SPONSORED BY:** Mary K. Sahs and Steve Duncan, P.E., respectively.