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PETITION BY REDBIRD	§	BEFORE THE	UTILITY COMMISSION
DEVELOPMENT, LLC FOR	§		FILING CLERK
EXPEDITED RELEASE	§		
FROM WATER CCN NO. 11052	§	PUBLIC UTILITY COMMISSION	
HELD BY DOBBIN PLANTERSVILLE	§		
WATER SUPPLY CORPORATION	§	OF TEXAS	

REDBIRD DEVELOPMENT, LLC'S RESPONSE TO COMMISSION STAFF'S FIRST REQUEST FOR INFORMATION

Comes now, Redbird Development, LLC (Redbird) and submits this, its Response to the Commission Staff's First Request for Information to Redbird Question Nos. Staff 1-1 through 1-3. As requested by the Commission Staff, the City provides the following response and documents, the witness swearing under oath:

Staff 1-1: Identify each time period in the last five years, if any, during which the Tract received water or sewer service and identify the retail public utility that provided the service.

Answer: At no period of time in the last five years has the Tract received water or sewer service from any retail public utility.

Witness: Perry Senn, Manager of Redbird

Staff 1-2: If known, identify the number of water connections that will be needed to serve the Tract and the projected timeline for the installation of these connections.

Redbird objects to this interrogatory on the grounds that it is outside the scope of discovery as it is seeking information that is not relevant to this case. A landowner's plans for development, if any, are not relevant to whether the landowner is entitled to streamlined expedited release under Texas Water Code § 13.2541. Subject to and without waiving the foregoing objections, Redbird responds as follows:

Answer: Redbird anticipates there will be 575 water connections. Redbird expects these connections to come online between June 2022 and July 2025.

Witness: Perry Senn, Manager of Redbird

Staff 1-3: If known, identify the number of sewer connections that will be needed to serve the Tract and the projected timeline for the installation of these connections.

Answer: Redbird objects to this interrogatory on the grounds that it is outside the scope of discovery as it is seeking information that is not relevant to this case. A landowner's plans for development, if any, are not relevant to whether the landowner is entitled to streamlined expedited release under Texas Water Code § 13.2541. Moreover, the number of sewer service connection has no bearing in a matter that involves a water certificate of convenience and necessity. Subject to and without waiving the foregoing objections, Redbird responds as follows:

Redbird anticipates there will be 575 sewer connections. Redbird expects these connections to come online between June 2022 and July 2025.

Witness: Perry Senn, Manager of Redbird

Respectfully submitted,

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BY: *Emily W. Rogers*
Emily W. Rogers

CERTIFICATE OF SERVICE

I certify that a copy of this document was served on all parties of record via email on June 29, 2021, in accordance with the requirements of 16 Tex. Admin. Code § 22.74 and PUC Order No. 2 in Docket No. 50664.

Emily W. Rogers

Emily W. Rogers

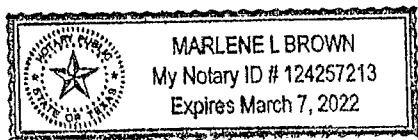
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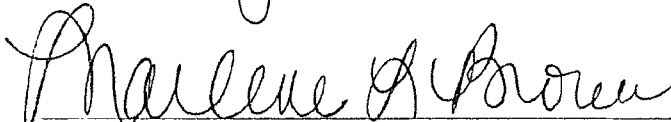
STATE OF TEXAS §
 §
 HARRIS §
COUNTY OF TRAVIS §

BEFORE ME, the undersigned authority, personally appeared Perry Senn, on behalf of Redbird Development, LLC, who states, upon oath, that the statements made in Staff 1-1 through 1-3 are within his personal knowledge and are true and correct.


Perry Senn

SUBSCRIBED AND SWORN BEFORE ME on June 29, 2021
by Perry Senn.




Notary Public, State of Texas