



## Filing Receipt

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July 29, 2021

Mary K. Sahs  
Mary K. Sahs, P.C.  
P.O. Box 40970  
Austin, TX 78704  
Email: [marysahs@sahslaw.onmicrosoft.com](mailto:marysahs@sahslaw.onmicrosoft.com)

Re: PUC Docket No. 52090 - Clarification of Redbird Development, LLC's Requests for Information to Dobbin Plantersville Water Supply Corporation

Dear Ms. Sahs:

As per our conversation today concerning your objections, as noted in your July 28, 2021 email to me, to several of Redbird Development, LLC's (Redbird) July 21, 2021 Requests for Information, please find the following clarifications to Redbird's Requests for Information:

1. Redbird is not requesting any documents or information that is attorney-client privileged or attorney work product.
2. Redbird does not object to Dobbin Plantersville producing only one set of the documents that are duplicative of documents that would be provided pursuant to the SIG Magnolia, L.P.'s Request for Information.
3. Request for Information No. 4 is amended as follows: Please list the groundwater conservation districts within which the WSC's CCN is located and provide the annual payments made to the groundwater district(s), and the associated groundwater volumes produced for Fiscal Years Ending in 2020, 2019, and 2018 and to-date Fiscal Year 2021.
4. Request for Information No. 12 is amended as follows: Please list any fixed assets associated with the area proposed for decertification that would be rendered useless, or would be under-utilized, as a result of the decertification.
5. With respect to Request for Information No. 16, Redbird does not object to Dobbin Plantersville providing a summary of the monthly totals or redacting text that would reveal attorney-client communications or attorney work product.

If you have any additional questions, please call me at 512-472-8021 or email me at [erogers@bickerstaff.com](mailto:erogers@bickerstaff.com).

Best regards,

A handwritten signature in cursive script that reads 'Emily W. Rogers'.

Emily W. Rogers  
Attorney for Redbird Development, LLC

cc: Phillip Lehmann ([Phillip.lehmann@puc.texas.gov](mailto:Phillip.lehmann@puc.texas.gov))