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Received - 2021-08-24 12:39:27 PM
Control Number - 52090
ItemNumber - 40

PUC DOCKET NO. 52090

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

**DOBBIN PLANTERSVILLE WSC’S RESPONSE TO
REDBIRD DEVELOPMENT REQUESTS FOR INFORMATION**

TO: Redbird Development, LLC, 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 Response to Redbird Development, LLC’s (“Redbird”) Requests for Information (“RFIs”) on the deadline extended by Order No. 7 (August 24, 2021). This 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 Redbird’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.

Mary K. Sahs

Mary K. Sahs
State Bar No. 17522300
P.O. Box 40970
Austin, Texas 78704
Telephone: (512) 585-1705
Facsimile: (512) 597-2516
Email: marysahs@sahslaw.com

**ATTORNEY FOR DOBBIN PLANTERSVILLE
WATER SUPPLY CORPORATION**

CERTIFICATE OF SERVICE

The undersigned hereby certifies that a copy of Respondent Dobbin Plantersville Water Supply Corporation's Supplemental Response to Redbird Development, LLC'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.

Mary K. Sahs

Mary K. Sahs

SUPPLEMENTAL RESPONSE TO REDBIRD'S REQUESTS FOR INFORMATION NO. 3

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

RESPONSE: As agreed, a copy of the requested supplemental information was provided in supplemental response to SIG Magnolia's requests for information in Docket No. 51979 and also serves as the response to this request for information.

PREPARED AND SPONSORED BY: See response to RFI 3 in Docket No. 51979