



Filing Receipt

Received - 2022-09-07 01:26:59 PM
Control Number - 52502
ItemNumber - 67

DOCKET NO. 52502

**APPLICATION OF TERRA
SOUTHWEST, INC. AND UNDINE
DEVELOPMENT, LLC FOR SALE,
TRANSFER, OR MERGER OF
FACILITIES AND CERTIFICATE
RIGHTS IN DENTON COUNTY**

§
§
§
§
§
§

**PUBLIC UTILITY COMMISSION

OF TEXAS**

UNDINE DEVELOPMENT, LLC SUPPLEMENTAL INFORMATION

Undine Development, LLC ("Undine") hereby files the supplemental information attached as "**Exhibit A**," submitted confidentially, pursuant to Commission Staff's informal information request.

Undine asserts that the information contained in this Exhibit A is exempt from disclosure pursuant to the Public Information Act based on Section 552.1 I0(c) of the Act because disclosure of the information, comprising sensitive commercial and financial information, would cause substantial competitive harm to Undine. The attorneys for Undine Development, LLC have reviewed the information sufficiently to state in good faith that the information is exempt from public disclosure under the Public Information act and merits the Protected Materials designation under the Protective Order issued in Docket NO. 52502. Undine further asserts that this material is of such a highly sensitive nature that making copies of such documents or information or providing access to such documents to employees of the Reviewing Party (as defined in the Protective Order) would expose a producing party to unreasonable risk of harm.

Gregg Law PC



Peter T. Gregg
State Bar No. 00784174
910 West Ave., No. 3
Austin, Texas 78701
Phone: 512-522-0702
Fax: 512-727-6070
pgregg@gregglawpc.com

Attorneys for Undine Development, LLC

CERTIFICATE OF SERVICE

By my signature above, I certify that on the 7th day of September, 2022 the foregoing document was served via first class mail and/or email to counsel of record in the matter.