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DOCKET NO. 52797

APPLICATION OF CONROE RESORT UTILITIES, LLC AND UNDINE DEVELOPMENT, LLC FOR SALE, TRANSFER, OR MERGER OF FACILITIES AND CERTIFICATE RIGHTS IN MONTGOMERY COUNTY	§ § § § § §	PUBLIC UTILITY COMMISSION OF TEXAS
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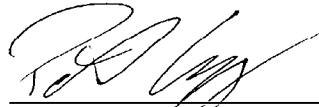
UNDINE DEVELOPMENT, LLC RESPONSE TO COMMISSION STAFF'S FIRST REQUEST FOR INFORMATION

Undine Development, LLC (“Undine”) hereby responds to Commission Staff’s First Request for Information Staff 1-1 through Staff 1-2. Undine’s response is set forth in the attached Exhibit A, **submitted as highly sensitive subject to the protective order issued in this matter pursuant to Order No. 1.**

Undine asserts that the information contained in this Exhibit A is exempt from disclosure pursuant to the Public Information Act based on Section 552.110(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 Protect Materials designation under the Protective Order issued in Docket NO. 52797. 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.

Respectfully submitted,

Gregg Law PC



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Attorneys for Undine Development, LLC

CERTIFICATE OF SERVICE

By my signature above, I certify that on the 11th day of March, 2022 the foregoing document was serviced via first class mail and/or email to counsel of record in the matter.