



## Filing Receipt

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**DOCKET NO. 52852**

<b>APPLICATION OF TERRA</b>	<b>§</b>	<b>PUBLIC UTILITY COMMISSION</b>
<b>SOUTHWEST, INC. AND UNDINE</b>	<b>§</b>	
<b>DEVELOPMENT, LLC FOR SALE,</b>	<b>§</b>	<b>OF TEXAS</b>
<b>TRANSFER, OR MERGER OF</b>	<b>§</b>	
<b>FACILITIES AND CERTIFICATE</b>	<b>§</b>	
<b>RIGHTS IN DENTON COUNTY</b>	<b>§</b>	

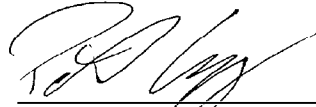
**APPLICANTS' SUPPLEMENT TO APPLICATION**

On November 16, 2021, Terra Southwest, Inc. (“Terra”) and Undine Development, LLC (“Undine”), (collectively, Applicants), filed an application for the sale, transfer, or merger of facilities and certificate rights in Denton County. Applicants filed supplemental information on November 17, 19, 22 and December 13, 2021, and also on January 24, 2022. In response to Commission’s Staff’s April 21, 2022, informal request for additional information, Undine files this further supplement to the Application. Attached, as Exhibit A, is the response to the informal information request, 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 29th day of April, 2022, the foregoing document was served on the following:

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**DOCKET NO. 52852**

**EXHIBIT A**

**(SUBMITTED CONFIDENTIALLY)**

# CONFIDENTIAL

**DOCKET NO.:** 52852

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

**SUBMITTING PARTY:** Undine Texas, LLC

**BRIEF DESCRIPTION OF CONTENTS:** Exhibit A – Financial Information

**BATE STAMP OR SEQUENTIAL PAGE NUMBER RANGE:** HIGHLY SENSITIVE-001 TO -038

**ENVELOPE #:** 1 OF 1

**ADDITIONAL INFORMATION REQUIRED BY PROTECTIVE ORDER:**

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**DATE SUBMITTED TO COMMISSION:** April 29, 2022