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## **DOCKET NO. 52852**

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

## UNDINE DEVELOPMENT, LLC SUPPLEMENTAL INFORMATION

Undine Development, LLC ("Undine") hereby provides, as Exhibit A, supplemental information for the application pursuant to the request of Commission Staff. Exhibit A is 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 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. 52852. 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 14<sup>th</sup> day of June, 2022 the foregoing document was serviced via first class mail and/or email to counsel of record in the matter.