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DOCKET NO. 53209

APPLICATION OF UNDINE TEXAS,	§	PUBLIC UTILITY COMMISSION
LLC FOR A PASS-THROUGH RATE	§	
CHANGE	§	OF TEXAS

**COMMISSION STAFF'S FIRST REQUEST FOR INFORMATION TO
UNDINE TEXAS, LLC
QUESTION NOS. STAFF 1-1 THROUGH STAFF 1-4**

Pursuant to 16 Texas Administrative Code (TAC) § 22.144 of the Commission's Procedural Rules, the Staff of the Public Utility Commission of Texas (Staff) requests that Undine Texas, LLC by and through its representative of record, provide the following information and answer the following questions under oath. The questions shall be answered in sufficient detail to fully present all of the relevant facts, within the time limit provided by the Presiding Officer or within 20 days if the Presiding Officer has not provided a time limit. Please copy the questions immediately above the answer to each question. These questions are continuing in nature, and if there is a relevant change in circumstances, submit an amended answer, under oath, as a supplement to your original answer. State the name of the witness in this cause who will sponsor the answer to the question and can vouch for the truth of the answer.

Provide responses to the Requests for Information by filing with the Commission solely through the Interchange on the Commission's website and provide notice, by email, to all other parties that the pleading or document has been filed with the Commission, unless otherwise ordered by the presiding officer pursuant to the Second Order Suspending Rules in Project No. 50664.

Dated: May 24, 2022

Respectfully submitted,

**PUBLIC UTILITY COMMISSION OF TEXAS
LEGAL DIVISION**

Keith Rogas
Division Director

Robert Dakota Parish
Managing Attorney

/s/ Ian Groetsch
Ian Groetsch
State Bar No. 24078599
Bradley Reynolds
State Bar No. 24125839
1701 N. Congress Avenue
P.O. Box 13326
Austin, Texas 78711-3326
(512) 936-7465
(512) 936-7268 (facsimile)
Ian.Groetsch@puc.texas.gov

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CERTIFICATE OF SERVICE

I certify that, unless otherwise ordered by the presiding officer, notice of the filing of this document was provided to all parties of record via electronic mail on May 24, 2022, in accordance with the Second Order Suspending Rules, issued in Project No. 50664.

/s/ Ian Groetsch
Ian Groetsch

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**COMMISSION STAFF'S FIRST REQUEST FOR INFORMATION TO
UNDINE TEXAS, LLC
QUESTION NOS. STAFF 1-1 THROUGH STAFF 1-4**

DEFINITIONS

- 1) "Undine," "Undine Texas," "your," or "you" refers to that Undine Texas, LLC and any person acting or purporting to act on their behalf, including without limitation, attorneys, agents, advisors, investigators, representatives, employees, or other persons.
- 2) "Document" includes any written, recorded, or graphic matter, however produced or reproduced, including but not limited to correspondence, telegrams, contracts, agreements, notes in any form, memoranda, diaries, voice recording tapes, microfilms, pictures, computer media, work papers, calendars, minutes of meetings or other writings or graphic matter, including copies containing marginal notes or variations of any of the foregoing, now or previously in your possession. In the event any documents requested by this Request for Information have been transferred beyond your control, describe the circumstances under which the document was destroyed or transferred and provide an exact citation to the subject document. In the event that documents containing the exact information do not exist, but documents do exist which contain portions of the required information or which contain substantially similar information, then the definition of "documents" shall include the documents which do exist, and these documents will be provided.**Error! Bookmark not defined.**

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**COMMISSION STAFF'S FIRST REQUEST FOR INFORMATION TO
UNDINE TEXAS, LLC
QUESTION NOS. STAFF 1-1 THROUGH STAFF 1-4**

INSTRUCTIONS

- 1) Pursuant to 16 TAC § 22.144(c)(2), Staff requests that answers to the requests for information be made under oath.
- 2) Please copy the question immediately above the answer to each question. State the name of the witness in this cause who will sponsor the answer to the question and can vouch for the truth of the answer.
- 3) These questions are continuing in nature, and if there is a relevant change in circumstances, submit an amended answer, under oath, as a supplement to your original answer.
- 4) Words used in the plural shall also be taken to mean and include the singular. Words used in the singular shall also be taken to mean and include the plural.
- 5) The present tense shall be construed to include the past tense, and the past tense shall be construed to include the present tense.
- 6) If any document is withheld under any claim of privilege, please furnish a list identifying each document for which a privilege is claimed, together with the following information: date, sender, recipients or copies, subject matter of the document, and the basis upon which such privilege is claimed.
- 7) Pursuant to 16 TAC § 22.144(h)(4), if the response to any request is voluminous, please provide a detailed index of the voluminous material.
- 8) Staff requests that each item of information be made available as it is completed, rather than upon completion of all information requested.

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**COMMISSION STAFF'S FIRST REQUEST FOR INFORMATION TO
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- Staff 1-1** Please explain Undine's process for determining whether to replace pressure tanks before repairing and replacing leaking water lines.
- Staff 1-2** Please explain whether replacing items that lead to better pressure increases the water loss in leaking lines. Please provide a detailed explanation in your answer.
- Staff 1-3** Has Undine applied for a system improvement charge that includes the plant improvements and replacements described in this application for the Spring Creek Valley Estates Subdivision, the Hazy Hollow East Estates Subdivision, and the River Club Water Company? If your answer is yes, please describe each plant improvement and replacement type and organize your answers by division.
- Staff 1-4** Please describe Undine's plans and policies for reducing line losses at the Spring Creek Valley Estates Subdivision, the Hazy Hollow East Estates Subdivision, and the River Club Water Company.