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**SOAH DOCKET NO. 473-24-04314
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APPLICATION OF INTEGRA WATER TEXAS, LLC FOR AUTHORITY TO CHANGE RATES	§ § §	BEFORE THE STATE OFFICE OF ADMINISTRATIVE HEARINGS
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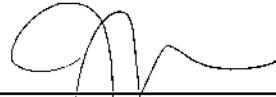
**INTEGRA WATER TEXAS, LLC'S RESPONSE TO THE OFFICE
OF PUBLIC UTILITY COUNSEL'S THIRD REQUEST FOR INFORMATION**

Integra Water Texas, LLC (Integra or Company), files this Response to the Third Request for Information (RFI) filed by the Office of Public Utility Counsel (OPUC). The discovery request was received by Integra on December 22, 2023; therefore, these responses are timely filed. Pursuant to 16 Texas Administrative Code (TAC) § 22.144(c)(2)(F), these responses may be treated as if they were filed under oath.

Respectfully submitted,

**LLOYD GOSSELINK ROCHELLE
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**ATTORNEYS FOR INTEGRA WATER
TEXAS, LLC**

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 January 8, 2024, in accordance with the Order Suspending Rules, issued in Project No. 50664.



JAMIE L. MAULDIN

INTEGRA'S RESPONSE TO OPUC'S THIRD RFI

OPUC 3-1: With regard to the contractor and spill referenced in Integra's Response to OPUC's RFI 2-2(a), please answer the following:

- a. Was the contractor held financially responsible for the cost of the spill's clean up?
- b. If the contractor was not held financially responsible, why not?
- c. If the contractor was held financially responsible, what was the contractor's contribution to the cost of the clean-up?
- d. Are there any insurance claims associated with the incident?
- e. If there are any associated insurance claims, please explain the status of the claim(s).
- f. If there are no associated insurance claims, please explain why not.

RESPONSE:

- a. No.
- b. Cloudy Management, the contractor, was not responsible for the spill. When the Developer's utility contractor installed the infrastructure, the utility contractor left a plug in the line at one of the manholes.

Integra requested the Developer to warranty the associated costs. The Developer refused, stating the event occurred after the Asset Purchase Agreement's warranty period concluded.

- c. Not applicable.
- d. No.
- e. Not applicable.
- f. The spill occurred after the Asset Purchase Agreement's warranty period concluded.

Prepared by: Sean McMillan
Sponsored by: Sean McMillan

INTEGRA'S RESPONSE TO OPUC'S THIRD RFI

OPUC 3-2: What is Integra's current customer count?

RESPONSE: 258.

Prepared by: John McDonald

Sponsored by: John McDonald