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**SOAH DOCKET NO. 473-25-14207
PUC DOCKET NO. 56354**

APPLICATION OF UNDINE, LLC FOR AUTHORITY TO CHANGE RATES	§ § §	BEFORE THE STATE OFFICE OF ADMINISTRATIVE HEARINGS
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**UNDINE, LLC’S FIRST REQUEST FOR
INFORMATION TO THE OFFICE OF PUBLIC UTILITY COUNSEL**

Undine, LLC (Undine) files its First Request for Information (RFI) to the Office of Public Utility Counsel (OPUC) in the above-styled docket. OPUC is hereby requested to furnish one copy of all items of information enumerated on the attached sheets directly to the undersigned attorney at the offices of Lloyd Gosselink Rochelle & Townsend, P.C., 816 Congress Avenue, Suite 1900, Austin, Texas 78701 within fifteen (15) calendar days. These requests shall be deemed continuing so as to require further and supplemental responses if OPUC receives or generates additional information within the scope of these requests between the time of the original response and the time of the hearing. Also, where data is requested, provide it in hard copy and Excel format with all formulas intact.

DEFINITIONS AND INSTRUCTIONS

A. “OPUC” refers to the Office of Public Utility Counsel.

B. The term “document” shall have the broadest meaning possible under the Texas Rules of Civil Procedure and shall include, but not be limited to, the original (or a copy when the original is not available), each non-identical copy (including those which are non-identical by reason of notations or marking, or by appearing in the files of a separate person), and any books, notebooks, pamphlets, periodicals, letters, reports, memoranda, handwritten notes, notations, messages, telegrams, wires, cables, press or news wire releases, records, studies, analyses, summaries, magazines, booklets, circulars, catalogs, bulletins, instructions, operating or maintenance manuals, operating or product specifications, fabrication sheets, test data, design specifications, parts lists, calendars, day-timers, notes or records of meetings, notices, purchase orders, bills, ledgers, checks, tabulations, questionnaires, surveys, drawings, sketches, schematics, blueprints, flow sheets, working papers, charts, graphs, indices, tapes, agreements, releases, appraisals, valuations, estimates, opinions, financial statements, accounting records, income statements, photographs, films or videotapes, back-up tapes, minutes, contracts, leases, invoices, records of purchase or sale, correspondence, electronic or other transcription or tapings of or notes pertaining to telephone or personal conversations or conferences, tape recordings, electromagnetic recordings, voice mail message or transcriptions thereof, interoffice communications of all types, e-mail messages, printouts of e-mail messages, instant messages or printouts thereof, microfilms, electronic databases, CDs, DVDs, videotapes or cassettes, films, movies, computer printouts and any and all other written, printed, typed, punched, engraved, taped, filmed, recorded (electronically

or otherwise), labeled, or graphic matter, of whatever description, however produced or reproduced (including computer-stored or generated data, together with instructions or programs necessary to search and retrieve such data), and shall include all attachments to (including tangible things) and enclosures with (including tangible things) any requested item, to which they are attached or with which they are enclosed, and each draft thereof. A draft of a non-identical copy is a separate document within the meaning of this term. An electronic copy of a paper document is a separate document within the meaning of this term.

C. Pursuant to Tex. R. Civ. P. 196.4, Undine specifically requests that any electronic or magnetic data (which is included in the definition of “document”) that is responsive to a request herein be produced on CD-ROM in a format that is compatible with Microsoft Office and/or Word Perfect and be produced with your response to these requests. Undine further requests that OPUC produce electronic copies of all paper documents, including any metadata attached to such documents, and produce all electronic originals or all responsive documents.

D. The terms “and” and “or” shall be construed both disjunctively and conjunctively as necessary to make the request inclusive rather than exclusive.

E. “Each” shall be construed to include the word “every” and “every” shall be construed to include the word “each.”

F. “Any” shall be construed to include “all” and “all” shall be construed to include “any.”

G. The term “concerning,” or one of its inflections, includes the following meanings: relating to; referring to; pertaining to; regarding; discussing; mentioning; containing; reflecting; evidencing; describing; showing; identifying; providing; disproving; consisting of; supporting; contradicting; in any way legally, logically or factually connected with the matter to which the term refers; or having a tendency to prove or disprove the matter to which the term refers.

H. The term “including,” or one of its inflections, means and refers to “including but not limited to.”

I. 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.

J. The present tense shall be construed to include the past tense, and the past tense shall be construed to include the present tense.

K. 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.

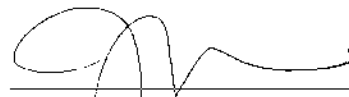
L. Pursuant to 16 Tex. Admin Code § 22.144(h)(4), if the response to any request is voluminous, please provide a detailed index of the voluminous material.

M. If the information requested is included in previously furnished exhibits, workpapers, responses to other discovery inquiries or otherwise, in hard copy or electronic format, please furnish specific references thereto, including Bates Stamp page citations and detailed cross references.

Respectfully submitted,

**LLOYD GOSSELINK ROCHELLE
& TOWNSEND, P.C.**

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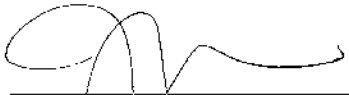
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ATTORNEYS FOR UNDINE, LLC

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 May 20, 2025, in accordance with the Order Suspending Rules, issued in Project No. 50664.



JAMIE L. MAULDIN

UNDINE'S FIRST RFI TO OPUC

UNDINE 1-1 Please provide, in native format, all workpapers, schedules, and documents supporting the testimony of each witness that has filed testimony on OPUC's behalf in this proceeding. Please ensure that all formulas and cells are intact.

UNDINE 1-2 Please provide the following information for each witness that has provided testimony for OPUC in this case:

- a. the subject matter on which the witness will testify;
- b. the facts known by the witness that relate to or form the basis of the witness's mental impressions and opinions formed or made in connection with the testimony;
- c. the methods by which the mental impressions and opinions were formed;
- d. all documents, tangible things, reports, models, or data compilations that have been provided to the witness in anticipation of his or her testimony. For the rate filing package filed by Undine in this proceeding, do not provide the documents but instead list the portions of the rate filing package (including any updates) provided to the witness, including the specific pages reviewed (provide Bates Stamp numbers). For discovery responses that have been provided by Undine in this proceeding, do not provide the documents but instead list the discovery response, including the specific pages provided to the witness (provide the Bates Stamp numbers);
- e. all documents, tangible things, reports, models or data compilations that have been reviewed by the witness in anticipation of his or her testimony. For the rate filing package filed by Undine in this proceeding, do not provide the documents but instead list the portions of the rate filing package (including any updates) reviewed by the witness, including the specific pages reviewed (provide Bates Stamp numbers). For discovery responses that have been provided by Undine in this proceeding, do not provide the documents but instead list the discovery response, including the specific pages provided or reviewed (provide Bates Stamp numbers), and the specific facts contained on each page that relate to or form the basis of the witness's mental impressions and opinions;
- f. the witness's current resume and bibliography, including, for the period since January 1, 2015, a complete listing of cases in which the witness has submitted testimony. Further, provide the docket number, jurisdiction, the party for whom testimony was submitted, and the topics addressed in the testimony;
- g. copies of all articles, speeches, published materials, and peer-reviewed material written by the witness (or, for documents that are publicly

UNDINE'S FIRST RFI TO OPUC

available online, a link to access the online document may be provided instead of a copy);

- h. the witness's billing rate, if not an employee of OPUC; and
- i. the number of hours spent by the witness on this case by week.

UNDINE 1-3 For each witness that has provided testimony for OPUC, please provide, for the period since January 2015, a complete copy of all prior testimonies submitted or testified to at hearing by the witness relating to the topic(s) the witness will address in this docket. For testimony that is readily available from the PUCT website, simply list the docket number, and for documents that are otherwise publicly available online, a link to access the online document may be provided instead of a copy of the document.