

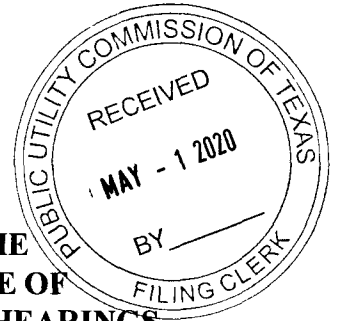
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PUC DOCKET NO. 49795  
SOAH DOCKET NO. 473-20-1118



COMPLAINT OF PETTY GROUP, LLP AGAINST RIO GRANDE ELECTRIC COOPERATIVE, INC.	§ § §	BEFORE THE STATE OFFICE OF ADMINISTRATIVE HEARINGS
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**PETTY GROUP, LLP'S SECOND SUPPLEMENTAL RESPONSE TO RIO GRANDE  
ELECTRIC COOPERATIVE, INC.'S RFI 1-32**

Petty Group, LLP ("Petty") hereby submits this Second Supplemental Response to RFI number 1-32 from Rio Grande Electric Cooperative, Inc.'s ("RGEC") First Requests for Information ("RFIs") to Petty Group, LLP. This response is timely filed. Pursuant to 16 Tex. Admin. Code § 22.144(c), Petty files this response without agreeing to the relevancy of the information sought and without waiving its right to object at the time of the hearing to the admissibility of the information provided herein. Petty also files this response subject to and without waiving its right to withhold documents protected by the attorney-client, attorney work product and consulting expert privilege.

Respectfully submitted,

/s/ Meghan Griffiths  
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ATTORNEYS FOR PETTY GROUP, LLP

**CERTIFICATE OF SERVICE**

The undersigned hereby certifies that a copy of the forgoing was served on all parties of record in this proceeding on May 1, 2020 by electronic mail.

/s/Meghan Griffiths  
Meghan Griffiths

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SOAH DOCKET NO. 473-20-1118**

<b>COMPLAINT OF PETTY GROUP, LLP</b>	<b>§</b>	<b>BEFORE THE</b>
<b>AGAINST RIO GRANDE ELECTRIC</b>	<b>§</b>	<b>STATE OFFICE OF</b>
<b>COOPERATIVE, INC.</b>	<b>§</b>	<b>ADMINISTRATIVE HEARINGS</b>

**PETTY GROUP, LLP'S SECOND SUPPLEMENTAL RESPONSE TO  
RIO GRANDE ELECTRIC COOPERATIVE, INC.'S RFI 1-32**

1.32 Identify in detail the equipment that Petty alleges to have been damaged as a result of power quality issues on the RGEC system, including:

- (1) The make, model and rating of each;
- (2) The date of installation and commissioning documentation;
- (3) The date of the alleged damage to the equipment.
- (4) The particular damage alleged to have occurred to the equipment;
- (5) Any replacement equipment purchased;
- (6) Any repairs to the equipment that you alleged were necessitated by any acts or omissions of RGEC;
- (7) Any repairs, warranty claims, or insurance claims made on such equipment;
- (8) The identity of any persons making the determination that such equipment was the result of any acts or omissions by RGEC.

**RESPONSE:**

(1) – (7) – See attached.

(8) – Will Supplement.

Prepared by: Kyle Haley

Sponsored by: TBD

Attachment: 1.32 (confidential).

**FIRST SUPPLEMENTAL RESPONSE:**

In addition, see Direct Testimony of Kyle Haley and Exhibit KH-10.

Sponsored by: Kyle Haley

**SECOND SUPPLEMENTAL RESPONSE:**

Through the course of recent depositions, Petty became aware that it had inadvertently omitted from Exhibit KH-10 another AC unit that was damaged. That unit [REDACTED] [REDACTED] was installed at the new residence referred to as "Casita 1" in late 2018. Maverick AC replaced a blower fan motor and condenser fan motor on that unit in February 2019 and invoiced MC Builders for that work [REDACTED] [REDACTED]

Please see attached an amended Exhibit KH-10 (confidential) and invoice for the repair (confidential). See also Errata to Direct Testimonies of Kyle Haley and Gilbert Marquez Jr.

Sponsored by: Kyle Haley

**CONFIDENTIAL DOCUMENTS  
BEING PRODUCED UNDER  
CONFIDENTIAL SEAL**