

Control Number: 50584



Item Number: 130

Addendum StartPage: 0



DOCKET NO. 50584

**JOINT REPORT AND APPLICATION
OF WIND ENERGY TRANSMISSION
TEXAS, LLC; AXINFRA US LP;
HOTSPUR HOLDCO 1 LLC; HOTSPUR
HOLDCO 2 LLC; AND 730 HOTSPUR,
LLC, FOR REGULATORY
APPROVALS UNDER PURA §§ 14.101,
39.262, AND 39.915**

**PUBLIC UTILITY COMMISSION
OF TEXAS**

**AXINFRA US LP's CONFIDENTIALITY STATEMENT UNDER
SECTION 4 OF THE PROTECTIVE ORDER DESIGNATING CONFIDENTIAL AND
HIGHLY SENSITIVE PROTECTED MATERIALS**

The undersigned attorneys for AxInfra US LP ("AxInfra"), Hotspur HoldCo 1 LLC ("Hotspur 1"), Hotspur HoldCo 2 LLC ("Hotspur 2"), and 730 Hotspur, LLC ("730 Hotspur") hereby submit this statement under Section 4 of the protective order entered in this case.

The information produced by AxInfra in its responses to Texas Industrial Energy Consumers' ("TIEC") requests for information TIEC-AXINFRA 8-1, 8-2 and 8-3 has been reviewed by AxInfra's undersigned counsel sufficiently to state in good faith that certain information contained in AxInfra's responses is exempt from public disclosure under the Texas Public Information Act.¹ The reasons supporting the designation are outlined below.

The response to TIEC-AXINFRA 8-1 contains non-public, sensitive financial data of named individuals. Public disclosure of the information would cause competitive harm to AxInfra and the individuals described in the response. This information is exempt from public disclosure under Sections 552.101, 552.104 and 552.110 of the Public Information Act as highly sensitive protected information.

The responses to TIEC-AXINFRA 8-2 and 8-3 contain non-public details related to a law enforcement investigation of a third-party company that is not a party to this proceeding. The


¹ Tex. Gov't Code §§ 552.101-552.353 (West 2012 & Supp.).

investigatory information in the responses did not lead to a conviction or deferred adjudication for any AxInfra individuals. Thus, the information is exempt from public disclosure pursuant to Section 552.108 of the of the Public Information and merits designation as highly sensitive protected information.

Respectfully submitted,

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CERTIFICATE OF SERVICE

I hereby certify that on this 15th day of May 2020, notice of the filing of this document was provided to all parties of record via electronic mail in accordance with the Order Suspending Rules, issued in Project No. 50664.


C. Glenn Adkins