

Control Number: 49795



Item Number: 110

Addendum StartPage: 0



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

COMPLAINT OF PETTY GROUP, LLP \$ BEFORE THE AGAINST RIO GRANDE ELECTRIC \$ STATE OFFICE OF COOPERATIVE, INC. \$ ADMINISTRATIVE HEARINGS

PETTY GROUP, LLP'S THIRD AMENDED AND SUPPLEMENTAL RESPONSES TO RIO GRANDE ELECTRIC COOPERATIVE, INC.'S FIRST REQUESTS FOR INFORMATION

Petty Group, LLP ("Petty") hereby submits this Third Amended and Supplemental Responses to Rio Grande Electric Cooperative, Inc.'s ("RGEC") First Requests for Information ("RFIs") to Petty Group, LLP. These responses are timely filed. Pursuant to 16 Tex. Admin. Code § 22.144(c), Petty files these responses 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 these responses 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 E. Griffiths

Meghan E. Griffiths
State Bar No. 24045983
Jennifer Ferri
State Bar No. 24065224
Alisha Mehta
State Bar No. 24102190
Jackson Walker LLP
100 Congress Ave., Suite 1100
Austin, Texas 78701
512-236-2363
512-391-2163 (fax)
mgriffiths@jw.com
iferri@jw.com

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 the 7th day of May, 2020 by hand delivery, facsimile, electronic mail, First Class U.S. Mail, or overnight delivery.

/s/ Alisha Mehta
Alisha Mehta

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

COMPLAINT OF PETTY GROUP, LLP \$ BEFORE THE AGAINST RIO GRANDE ELECTRIC \$ STATE OFFICE OF COOPERATIVE, INC. \$ ADMINISTRATIVE HEARINGS

PETTY GROUP, LLP'S THIRD AMENDED AND SUPPLEMENTAL RESPONSE TO RIO GRANDE ELECTRIC COOPERATIVE, INC.'S FIRST REQUESTS FOR INFORMATION

1.26. Please provide all documents, correspondence (including text messages), reports, or studies from January 1, 2015 to the present related to power quality issues at the Petty Ranch.

RESPONSE:

See attached.

Prepared by: Kyle Haley

Sponsored by: Kyle Haley

Attachment: 1.26 (Confidential)

SUPPLEMENTAL RESPONSE:

Prepared by: Kyle Haley

Sponsored by: Kyle Haley

Attachment: RFI 1.26 Supplement 5-7-2020 (Confidential)

CONFIDENTIAL RESPONSIVE DOCUMENTS ARE BEING SUBMITTED UNDER CONFIDENTIAL COVER