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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

WIND ENERGY TRANSMISSION TEXAS, LLC'S STATEMENT UNDER SECTION 4 OF THE PROTECTIVE ORDER DESIGNATING CONFIDENTIAL PROTECTED MATERIALS

The undersigned attorneys for Wind Energy Transmission Texas, LLC ("WETT"), hereby submit this statement under Section 4 of the protective order entered in this case.

The information produced by WETT in its response to Commission Staff's ("Staff") requests for information ("RFI") STAFF-WETT 2-3 has been reviewed by WETT's undersigned counsel sufficient to state in good faith that certain information contained in WETT's responses is exempt from public disclosure under the Texas Public Information Act.¹ The reasons supporting the designation are outlined below.

I. DESCRIPTION OF PROTECTED MATERIALS

The response to 2-3 contains trade secret and commercially sensitive internal operational information that, if disclosed, would cause substantial competitive harm to the person from whom the information was obtained and because the information is not intended for public consumption and is deemed to be confidential or proprietary by WETT. This information is exempt from public disclosure under at least 552.101, 552.110 and/or 552.1101 of the Public Information Act as confidential protected information.

¹ Tex. Gov't Code §§ 552.101-552.353.

II. STATEMENT OF COUNSEL

The undersigned counsel for WETT has reviewed the foregoing materials sufficiently to state in good faith that parts of the information contained therein is confidential protected material for at least the reasons stated above.

Respectfully submitted,

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CERTIFICATE OF SERVICE

I certify that a copy of this document will be served by electronic mail, facsimile, hand-delivery, overnight delivery, First Class U.S. Mail, and/or e-mail, if permitted, on all parties of record in this proceeding on May 7, 2020.

Dennis W. Donley, Jr