



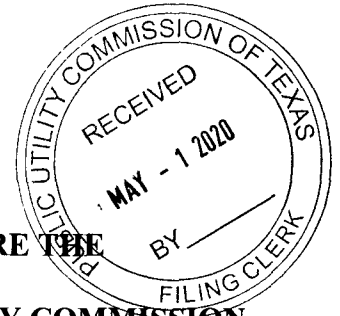
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**PUC DOCKET NO. 49795
SOAH DOCKET NO. 473-20-1118**



**COMPLAINT OF PETTY GROUP, LLP
AGAINST RIO GRANDE ELECTRIC
COOPERATIVE, INC.**

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**BEFORE THE
PUBLIC UTILITY COMMISSION
OF TEXAS**

**PETTY GROUP LLP'S
SIXTH SET OF REQUESTS FOR INFORMATION
TO RIO GRANDE ELECTRIC COOPERATIVE, INC.**

Pursuant to 16 Tex. Admin. Code § 22.144, Petty Group, LLP ("Petty") hereby files its Sixth Set of Requests for Information ("RFIs") to Rio Grande Electric Cooperative, Inc. ("RGEC"). Responses to the RFIs set forth in Exhibit "A" hereto should be served on the following persons at the address indicated below within ten (10) days of service hereof.

Meghan Griffiths
Jennifer Ferri
Jackson Walker LLP
100 Congress Avenue, Suite 1100
Austin, Texas 78701
512-236-2363
mgriffiths@jw.com
jferri@jw.com

Exhibit "A" is attached hereto and incorporated herein for all purposes.

DEFINITIONS

1. "RGEC," "you," or "your" refer to Rio Grande Electric Cooperative, Inc., and any person acting or purporting to act on its behalf, including without limitation any officers, employees, members of the board of directors, consultants, agents, attorneys, and affiliates.
2. "Document" and/or "documents" refers to all written, recorded, or graphic material within the scope of Rule 192 of the Texas Rules of Civil Procedure, however produced or reproduced. Without limiting the foregoing, the terms include the following: agreements, contracts, communications, correspondence, letters, faxes, e-mail, instant message records, text message records, memoranda, records, reports, summaries, records of telephone conversations, diary entries, meeting minutes, calendars, appointment books, drafts, notes, telephone bills or records, bills, statements, records of obligations and expenditures,

invoices, lists, journals, receipts, checks, canceled checks, letters of credit, envelopes, or folders, voice recordings, photographs, electronic data, electronic media, and any other data or information that exists in written, electronic, or magnetic form.

3. “Communication” refers to any oral or written utterance, notation, or statement of any nature whatsoever, by or to whomsoever made, and every manner or means of disclosure, transfer, or exchange of information, whether orally or by document, whether in person, in writing, by telephone, by cell phone, or otherwise, including, but not limited to: correspondence, conversation, dialogues, discussions, interviews, consultations, agreements, telegrams, telexes, cables, memorandum, electronic mail, hand-deliveries, facsimile, or other understandings and exchanges of ideas or information between two or more persons.
4. “Relate to,” “related to,” or “relating to” means concerning, relating to, referring to, having a relationship with or to, pertaining to, identifying, describing, explaining, summarizing, or to be otherwise factually, legally or logistically connected to the subject matter of the particular request.
5. “Petty Ranch” means the property with the address of 7604 Gates Road, Catarina, Texas.
6. “Identify” or “identification” means:
 - a. When used in reference to a natural person, that you should state that person’s full name, address, and telephone number.
 - b. When used with respect to a “document,” “that you should state the date, subject and substance, author, type of document (e.g., letter, telegram, memorandum, computer printout, sound reproduction, chart, photograph, film, etc.), its present location and the identity of each of its present custodians and shall include all documents including those that you may claim are privileged. If any document was, but no longer is, in your possession or subject to your control, state whether it is (a) missing or lost; (b) was destroyed; (c) was transferred voluntarily or involuntarily to others; or (d) otherwise disposed of, and in each such instance explain the circumstances surrounding any authorization for such disposition.
 - c. When used in respect to any meeting or conversation, that you should state the date and specific location of the meeting or conversation plus the “identification” of all persons present, attending, participating, witnesses or having knowledge of the meeting or conversations.
 - d. When used in respect to an occurrence, event, or happening, that you should describe in detail what occurred or transpired at the occurrence, event or happening; the date, specific location, and duration of the occurrence, event, or happening; and “identify” all persons present, attending, participating, witnessing, or having knowledge of the occurrence, event, or happening.

- e. When used in respect to a statement, that you should state the substance of the statement, the date and specific location of the statement, and “identify” all persons present, witnessing, making or having knowledge of the statement.

INSTRUCTIONS

1. Your responses should conform to the Texas Rules of Civil Procedure and/or the rules of procedure of the Public Utility Commission of Texas.
2. Each document that is made available for review in response to these RFIs shall be produced as it is kept in the usual course of business (i.e., in the file folder or binder in which the documents were located when the request was served) or the documents shall be organized or labeled to correspond to the category of documents requested.
3. If the documents requested herein include electronic data and magnetic data, they shall be produced in their native format with all metadata intact.
4. When answering these RFIs, you are requested to furnish all information available to you, including information in the possession of your attorneys, investigators, consultants, employees, agents, representatives, or any other person acting on your behalf, and not merely such information as is held or known by you personally.
5. In the event any document or other thing referred to in these RFIs is not in your possession, custody, or control, specify what disposition was made of it and identify the person or entity who now has possession, custody, or control of the document or thing.
6. If you withhold any requested documents or information—including redactions of portions of documents—pursuant to an applicable privilege, provide a privilege log describing the documents, communications, or things withheld or redacted with sufficient specificity that the applicability of the privilege or protection may be assessed. See Tex. R. Civ. P. 193.3.
7. PLEASE TAKE FURTHER NOTICE that these RFIs are continuing in nature. Your answers and responses must include all documents that are currently in your possession, custody, and control and that come into your possession, custody, or control in the future.

Respectfully submitted,

JACKSON WALKER L.L.P.

By: /s/ Meghan Griffiths
Meghan Griffiths
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Jennifer Ferri
State Bar No. 24065224
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ATTORNEYS FOR PETTY GROUP, LLP

CERTIFICATE OF SERVICE

I hereby certify that on the 1st day of May 2020, a true and correct copy of the foregoing document was served on all parties of record by facsimile, certified mail and electronic mail.

/s/ Alisha Mehta
Alisha Mehta

EXHIBIT A

REQUESTS FOR INFORMATION

- Petty 6-1: If not provided with your direct testimony in this case, please provide, in native format, all work papers and documents related to the testimony of each witness filing testimony on your behalf in this proceeding.
- Petty 6-2: For each testifying expert that has provided testimony for you in this case, please provide (to the extent not provided earlier):
- (a) A list of all cases in which the testifying expert has submitted testimony, from 2015 to the present;
 - (b) Copies of all prior testimony, articles, speeches, published materials and peer review materials written by the testifying expert, from 2015 to the present;
 - (c) The testifying expert's billing rate for this proceeding; and
 - (d) All documents and communications, including e-mail correspondence, provided to, reviewed by, or prepared by or for the testifying expert in anticipation of the testifying expert filing testimony in this proceeding.
- Petty 6-3: For each consulting expert whose mental impressions or opinions have been reviewed by one or more of your testifying experts in this case, please provide (to the extent not provided earlier):
- (a) A list of all cases in which the consulting expert has submitted testimony, from 2015 to the present;
 - (b) Copies of all prior testimony, articles, speeches, published materials and peer review materials written by the consulting expert, from 2015 to the present;
 - (c) The consulting expert's billing rate for this proceeding; and
 - (d) All documents and communications, including e-mail correspondence, provided to, reviewed by, or prepared by or for the consulting expert in anticipation of the testifying expert filing testimony in this proceeding.
- Petty 6-4: For each witness filing testimony on your behalf in this proceeding, please provide copies of all communications, including but not limited to e-mail correspondence and text messages, between the witness, including the witness' representatives, colleagues, and/or employees, and RGEC related to harmonics for the time period 2010 to the present.
- Petty 6-5: For each witness filing testimony on your behalf in this proceeding, please provide copies of all communications, including but not limited to e-mail correspondence and text messages, between the witness, including the witness' representatives,

EXHIBIT A

colleagues, and/or employees, and any other person related to harmonics on the RGEC system for the time period 2010 to the present.

Petty 6-6: Please provide copies of all communications, including but not limited to e-mail correspondence and text messages, related to harmonics for the time period 2010 to the present between RGEC and the following entities and their affiliates: [REDACTED]

Petty 6-7: Please provide the annual gross and net revenues received by RGEC for the time period 2010 to the present from the following entities and their affiliates: [REDACTED]

[REDACTED] This request applies to each site or property served by RGEC for the listed parties.

Petty 6-8: Please provide copies of all electric service agreements, including but not limited to interconnection agreements and facilities extension agreements, between RGEC and any of the following entities: [REDACTED]

[REDACTED]. This request applies to each site or property served by RGEC for the listed parties.

Petty 6-9: Please admit or deny whether RGEC tested the site(s) owned or operated by [REDACTED] that requested service from RGEC for compliance with Institute of Electrical and Electronics Engineers ("IEEE") Standard 519 before energization of the load or at any point in time between 2010 to the present. If admit, please provide the specific date for when the testing was performed for each site.

Petty 6-10: Please admit or deny whether RGEC tested the site(s) owned or operated by [REDACTED] that requested service from RGEC for compliance with IEEE Standard 519 before energization of the load or at any point in time between 2010 to the present. If admit, please provide the specific date for when the testing was performed for each site.

Petty 6-11: Please admit or deny whether RGEC tested the site(s) owned or operated by [REDACTED] that requested service from RGEC for compliance with IEEE Standard 519 before energization of the load or at any point in time between 2010 to the present. If admit, please provide the specific date for when the testing was performed for each site.

Petty 6-12: Please admit or deny whether RGEC tested the site(s) owned or operated by [REDACTED] that requested service from RGEC for compliance with IEEE Standard 519 before energization of the load or at any point in time between 2010 to the present. If admit, please provide the specific date for when the testing was performed for each site.

Petty 6-13: Please admit or deny whether RGEC verified the installation of harmonic filters upon energization for any of the following parties: [REDACTED]

EXHIBIT A

■ This request applies to each site or property served by RGEC for the listed parties. If admit, please provide the specific date when the verification was done for each site.

**CONFIDENTIAL DOCUMENTS
BEING PRODUCED UNDER
CONFIDENTIAL SEAL**