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APPLICATION OF TXU ELECTRIC	§	BEFORE THE
DELIVERY COMPANY TO AMEND A	§	STATE OFFICE OF
CERTIFICATE OF CONVENIENCE	§	ADMINISTRATIVE HEARINGS
AND NECESSITY (CCN) FOR A	§	
PROPOSED TRANSMISSION LINE	§	ON REFERRAL FROM THE
WITHIN JACK, WISE, AND DENTON	§	PUBLIC UTILITY COMMISSION
COUNTIES, TEXAS	§	OF TEXAS

RULE 11 AGREEMENT TO EXTEND TIME TO OBJECT AND RESPOND TO
REQUEST FOR INFORMATION AND MOVE TO COMPEL

between the following Intervenor

CITY OF BRIDGEPORT, TEXAS

and Applicant

TXU ELECTRIC DELIVERY COMPANY

Intervenor CITY OF BRIDGEPORT, TEXAS ("Intervenor") and Applicant TXU ELECTRIC DELIVERY COMPANY ("Electric Delivery") file this agreement, made under PUC Procedural Rule 22.144(k) and Texas Rules of Civil Procedure 11 and 191.1, to extend the time to object to discovery and to move to compel.

On March 29, 2005, Electric Delivery served requests for information on the Intervenor. PUC Procedural Rule 22.144(d) requires objections to be filed within 10 calendar days of receipt of the request for information. Responses to the requests are due within 20 calendar days.

Electric Delivery has agreed to withdraw some of its requests. Intervenor and Electric Delivery have negotiated in good faith. Intervenor believes that they have resolved any differences with Electric Delivery with respect to the scope of the discovery requested. Negotiations have so far resulted in the following agreements:

RULE 11 AGREEMENT TO EXTEND TIME TO OBJECT TO
REQUEST FOR INFORMATION AND TO MOVE TO COMPEL

A.

Intervenor will not be obligated to file objections to the requests for information until such time as the Intervenor file their responses, in lieu of the ten-day deadline in Rule 22.144(d). Intervenor shall file its responses subject to the objections raised in the responses. Electric Delivery shall have five working days after the responses are received to file a motion to compel. Intervenor and Electric Delivery will continue to negotiate in good faith after the responses are received in order to attempt to resolve differences, if any, between the parties. Intervenor acknowledges their duty to supplement their responses under PUC Procedural Rule 22.141(f) and Texas Rule of Civil Procedure 193.5.

B.

Electric Delivery has agreed to withdraw the following requests, to wit:

Request Nos. 1-20 + 1-21

C.

Intervenor will not be obligated to file its responses to those requests which have not been withdrawn until April 26, 2005, in lieu of the prior applicable deadline. *The discovery deadline for Intervenor's direct testimony shall be extended to May 3, 2005.*

The attorneys signatures are evidence of their intent that this document shall constitute a binding Rule 11 agreement between the parties hereto.

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ATTORNEYS FOR
CITY OF BRIDGEPORT, TEXAS

CERTIFICATE OF SERVICE

I certify I served the foregoing on all parties of record by Facsimile, First Class Mail or
Courier on April 26, 2005


Christopher N. Forbis