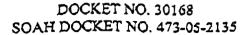


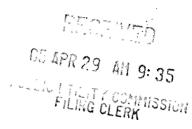
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APPLICATION OF TXU ELECTRIC DELIVERY COMPANY TO AMEND A CERTIFICATE OF CONVENIENCE AND NECESSITY (CCN) FOR A PROPOSED TRANSMISSION LINE WITHIN JACK, WISE, AND DENTON	יש ילי שי שי שי שי	BEFORE THE STATE OFFICE OF ADMINISTRATIVE HEARINGS ON REFERRAL FROM THE 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 Intervenors. 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 II AGREEMENT TO EXTEND TIME TO OBJECT TO REQUIRE FOR INFORMATION AND TO MOVE TO COMPIE.

Intervenor will not be obligated to file objections to the requests for information until such time as the Intervenors 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(I) and Texas Rule of Civil Procedure 193.5.

B.

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

Request Nos. /- 20 + /-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.

HUNTON & WILLIAMS, L.L.P. Energy Plaza 1601 Bryan Street, 30<sup>th</sup> Floor Dallas, Texas 75201-3402 214/979-3000 214/880-0011

E. Allen Nye, Jr. State Bar No. 00788134

Kirk D. Rasmussen State par No. 24013374

e. Alen Nye, Jr./Kirk D. Rasmussen

ATTORNEYS FOR APPLICANT

SEWELL AND FORBIS Sewell Building P. O. Box 534 102 West Walnut Street Decatur, Texas 76234 940/627-2143 940/627-6147 FAX

Christopher N. Forbis State Bar No. 07223900

Christopher N. Forbis

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