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December 1, 2006

Judge Thomas H. Walston  
Administrative Law Judge  
State Office of Administrative Hearings  
300 West 15<sup>th</sup> Street, Suite 502  
Austin, TX 78701

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Re: *SOAH Docket No. 473-07-0218; PUC Docket No. 32707 Application of Rayburn Country Electric Cooperative, Inc. for a Certificate of Convenience and Necessity (CCN) for a Proposed Transmission Line in Henderson and Van Zandt Counties, Texas*

Dear Judge Walston:

This letter is filed in response to the Supplemental Objections to Explorer's Second Request for Information ("RFI") filed by Rayburn Country Electric Cooperative, Inc. ("RCEC") on November 27, 2006. In its Supplemental Objections, RCEC states that it discovered certain documents responsive to Explorer's Second RFI after RCEC had filed its original Objections on November 16, 2006.

Since RCEC acknowledges that the documents at issue are responsive to Explorer's Second RFI, Explorer assumes that it is not necessary for Explorer to file a supplemental motion to compel production of such documents in view of the fact that it has already filed a motion to compel in response to RCEC's original objections. Out of an abundance of caution, Explorer is filing this letter to confirm that its motion to compel filed on November 27, 2006, applies to the documents that are the subject of RCEC's Supplemental Objections, for all the reasons set forth in such motion to compel.

Respectfully submitted,



James Guy  
Attorney for  
Explorer Pipeline Company

cc: All Parties