



Control Number: 38597



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APPLICATION OF ONCOR  
ELECTRIC DELIVERY COMPANY  
LLC TO AMEND A CERTIFICATE OF  
CONVENIENCE AND NECESSITY  
FOR THE KRUM WEST TO ANNA 345-  
kV CREZ TRANSMISSION LINE IN  
COLLIN, COOKE, DENTON AND  
GRAYSON COUNTIES

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BEFORE THE STATE OFFICE

OF

ADMINISTRATIVE HEARINGS

**MOTION TO COMPEL ROBERT HUGH MILLER TO RESPOND TO CLEAR  
CREEK RIDGE, ET AL.'S FIRST SET OF REQUESTS FOR INFORMATION  
AND REQUESTS FOR ADMISSION**

COME NOW Clear Creek Ridge, LLC, Crossen Family Ranch, Ltd., Walter M. Knight, Robert G. Klement, Joaquin Romero, and the Skiles Trust ("Clear Creek Ridge, et al.") and file this Motion to Compel Robert Hugh Miller to respond to their first set of Requests for Information (RFIs) and Requests for Admissions that were served upon Mr. Miller via mail on November 19, 2010. Mr. Miller's responses to these RFIs and RFIs were due not later than December 2, 2010 – due to their being served via mail – but as of December 6, 2010, were yet to be filed or received. Mr. Miller has not objected to any of Clear Creek Ridge, et al.'s RFIs and RFAs.

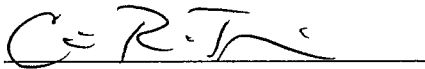
Counsel for Clear Creek Ridge, et al. has attempted to work with the Millers regarding the date of receipt of their responses and expected to receive the responses on December 3, 2010. Counsel for Clear Creek Ridge, et al. does not have the understanding that the Millers are in fact intending to provide responses to the RFIs and RFAs. While Clear Creek Ridge, et al. appreciates the challenges for pro se intervenors to respond to discovery, Mr. Miller had the time and the ability to file direct testimony and now has the right to admit his testimony into evidence and to participate in the hearing on the merits. Thus, other parties are prejudiced should Mr. Miller not be held to his obligation as an intervenor to respond to discovery. In light of the approaching hearing on the merits, Clear Creek Ridge, et al. files this Motion to Compel requesting

that Mr. Miller be required to provide Clear Creek Ridge, et al. his responses not later than the start of the hearing on the merits.

Clear Creek Ridge, et al. respectfully requests that Robert Hugh Miller be compelled to file and to serve Clear Creek Ridge, et al.'s his responses to First Requests for Information and First Requests for Admission not later than Monday, December 13, 2010. Clear Creek Ridge, et al. further request that if Mr. Miller does not do so, that his testimony be struck and that the Millers be dismissed as parties to the proceeding.

Respectfully submitted,

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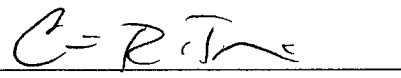
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**Attorneys for Clear Creek Ridge, LLC,  
Crossen Family Ranch, Ltd., Robert G.  
Klement, Walter M. Knight, Joaquin  
Romero and Skiles Trust**

**CERTIFICATE OF SERVICE**

I hereby certify that on this the 6<sup>th</sup> day of December 2010, a true and correct copy of the Clear Creek Ridge, LLC, Crossen Family Ranch, Ltd., Walter M. Knight, Robert G. Klement, Joaquin Romero and Skiles Trust's Motion to Compel Robert Hugh Miller to respond to discovery was served per Order No. 2 in the above-referenced docket.

By:   
CARRIE R. TOURNILLON