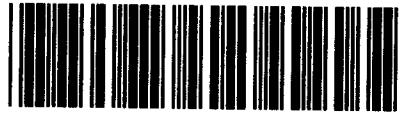


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APPLICATION OF WIND ENERGY §
TRANSMISSION TEXAS, LLC TO §
AMEND ITS CERTIFICATE OF §
CONVENIENCE AND NECESSITY FOR §
THE PROPOSED LONG DRAW TO §
SAND BLUFF, SAND BLUFF TO DIVIDE, §
AND SAND BLUFF TO BEARKAT 345- §
KV CREZ TRANSMISSION LINES IN §
BORDEN, COKE, GLASSCOCK, §
HOWARD, MITCHELL AND STERLING §
COUNTIES §

BEFORE THE STATE OFFICE

OF

ADMINISTRATIVE HEARINGS

**WIND ENERGY TRANSMISSION TEXAS, LLC'S OBJECTION TO
ROBERT MICHALEWICZ'S FIRST SET OF REQUESTS FOR INFORMATION**

Comes now WIND ENERGY TRANSMISSION TEXAS, LLC (WETT) and files this Objection to the aforementioned Request for Information (RFI). These RFIs were served on WETT on January 27, 2011. Accordingly, this response is timely filed.

In accordance with the Procedural Schedule set forth in Order No. 5, discovery on WETT's direct case—initially filed on November 10th, 2010—ended on January 25, 2011. WETT is currently responding to other timely filed discovery requests and reviewing forty-five pieces of intervenor direct testimony in order to prepare any necessary objections by this Friday, February 4, 2011.

Mr. Michalewicz filed his motion to intervene on December 6, 2010, well before Order No. 5 was entered setting the procedural schedule, including prescribing the discovery deadlines. Furthermore, Mr. Michalewicz did not file a motion for leave to file his discovery after the deadline. Nor did he state in his requests for information why he failed to comply with the procedural schedule (much less articulate any good cause exception for his tardy filing). Given this tight schedule, WETT objects to Mr. Michalewicz's late-filed RFIs.

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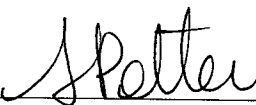
WETT also objects to the relevancy of the questions asked in the RFIs, as they are outside the scope of discovery and not likely to lead to admissible evidence in this docket, overly burdensome, and not appropriately limited in scope as required under the Texas Rules of Civil Procedure.

WETT respectfully requests that it be relieved of any obligation to respond to Mr. Michalewicz's RFIs. In the event that WETT is ordered to respond, WETT requests that it have 10 working days from the date of the order to prepare its responses.

Respectfully submitted,

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**ATTORNEYS FOR WIND ENERGY
TRANSMISSION TEXAS, LLC**

CERTIFICATE OF SERVICE

I certify that a true and correct copy of the foregoing document was served on the requesting party on this 31st day of January, 2011.


Stephanie S. Potter