



Control Number: 39861



Item Number: 9

Addendum StartPage: 0

DOCKET NO. 39861

| | | |
|--------------------------------|---|---------------------------|
| APPLICATION OF TAYLOR ELECTRIC | § | PUBLIC UTILITY COMMISSION |
| COOPERATIVE, INC. FOR | § | |
| APPROVAL OF TRANSMISSION COST | § | OF TEXAS |
| OF SERVICE AND WHOLESALE | § | |
| TRANSMISSION RATES | § | |

RECEIVED
 11 NOV -3 AM 10:15
 PUBLIC UTILITY COMMISSION
 FILING CLERK

**TAYLOR ELECTRIC COOPERATIVE, INC.'S INDEX OF DOCUMENTS
 CONTAINING CONFIDENTIAL OR HIGHLY SENSITIVE PROTECTED
 MATERIALS RESPONSIVE TO THE STAFF'S FIRST REQUEST FOR
 INFORMATION QUESTION NO. STAFF-1-1**

Pursuant to the Protective Order in this docket, Taylor Electric Cooperative Inc. ("Taylor") files this index of documents containing Confidential Information or Highly Sensitive Confidential Information responsive to Commission Staff's ("Staff") First Request for Information, Question No. Staff-1-1, and states the following in support.

An index of the documents containing Confidential Information or Highly Sensitive Confidential Information is attached as Exhibit A. This index indicates for each document: (a) the designation of information as Confidential or Highly Sensitive; (b) a description of the document; (c) the applicable exemptions under the Public Information Act of Texas; (d) an explanation of the designation of Confidential or Highly Sensitive; and (e) certification that the designation is made in good faith.

*Docket No. 39861
 Taylor Electric Cooperative, Inc.'s Index of Documents
 Containing Confidential or Highly Sensitive Information
 Responsive to Staff's First Request for Information
 Question No. Staff-1-1*

Respectfully submitted,

McGINNIS, LOCHRIDGE & KILGORE, L.L.P.
Shawn St. Clair
600 Congress Avenue #2100
Austin, Texas 78701
(512) 495-6071
(512) 505-6371 FAX
[sstclair@mcginnilaw.com](mailto:ssclair@mcginnilaw.com)

By: 
Shawn P. St. Clair
State Bar No. 19088800

ATTORNEYS FOR TAYLOR ELECTRIC
COOPERATIVE, INC.

*Docket No. 39861
Taylor Electric Cooperative, Inc.'s Index of Documents
Containing Confidential or Highly Sensitive Information
Responsive to Staff's First Request for Information
Question No. Staff-1-1*

EXHIBIT A – INDEX OF DOCUMENTS

1. Bates documents Taylor 01 – Taylor 014

- (a) **Designation of Information:** Confidential Materials
- (b) **Description of Document:** One-Line Diagrams of Taylor’s Substations
- (c) **Applicable Exemptions:** Public Information Act of Texas, §§ 552.101 and 552.139
- (d) **Explanation of Designation:** This exhibit contains one-line diagrams of Taylor’s substations, the disclosure of which would be inconsistent with the public interest. *See also* PURA §39.1511(a) (allowing ERCOT to go into executive session concerning “other information related to the security of the regional electrical network.”). Taylor’s response to Staff’s 1st RFI, Question No. Staff-1-1, includes an attachment containing one-line diagrams of Taylor’s substations which are considered confidential for regional electric network and homeland security reasons, *see* 18 C.F.R. §388.113(c), and are excepted from public disclosure under the TPIA.
- (e) **Certification of Counsel:** The undersigned counsel for Taylor has reviewed the information sufficiently to state in good faith that the information is exempt from public disclosure under the TPIA and merits the Protected Material designation. Taylor has provided the following responses designated as protected material:
1. Taylor’s Response to Staff’s 1st RFI, Question Staff-1-1.

CERTIFICATE OF SERVICE

I hereby certify that a true and correct copy of the above and foregoing instrument was served on all parties of record by hand delivery, Federal Express, regular first class mail, certified mail, or facsimile transmission on this the ___ day of November, 2011.


Shawn P. St. Clair