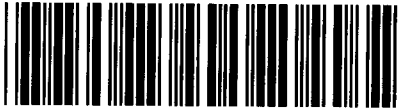




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SOAH DOCKET NO. 473-16-2751
PUC DOCKET NO. 45624

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APPLICATION OF THE CITY OF §
GARLAND TO AMEND A § BEFORE THE
CERTIFICATE OF CONVENIENCE §
AND NECESSITY FOR THE RUSK TO §
PANOLA DOUBLE-CIRCUIT 345-KV § STATE OFFICE OF
TRANSMISSION LINE IN RUSK AND § ADMINISTRATIVE HEARINGS
PANOLA COUNTIES §

**SOUTHERN CROSS TRANSMISSION LLC'S OBJECTIONS TO TEXAS INDUSTRIAL
ENERGY CONSUMERS' THIRD SET OF REQUESTS FOR INFORMATION**

Southern Cross Transmission LLC (SCT) files these objections to the Third Set of Request for Information (RFIs) from Texas Industrial Energy Consumers (TIEC).

I. INTRODUCTION

SCT received TIEC's Third Set of RFIs on April 20, 2016. Counsel for SCT and TIEC have attempted to negotiate these objections diligently and in good faith. The negotiations were unsuccessful. Pursuant to the SOAH Order No. 2, these objections are timely filed.

II. RESERVATION OF RIGHTS

Based on diligent inquiry, SCT believes that all necessary objections have been raised in this pleading. SCT does not; however, waive its right, if additional documents are subsequently found that are responsive to these requests, to claim that such documents are privileged if such an objection is determined to be appropriate.

III. OBJECTIONS TO DEFINITIONS AND INSTRUCTIONS

SCT objects to the definitions and instructions preceding TIEC's RFIs to the extent they attempt to impose requirements in excess of the applicable rules. SCT will respond to discovery in accordance with the Commission's rules, the Texas Rules of Civil Procedure, the Administrative Procedure Act and the Protective Order, as applicable.

IV. SPECIFIC OBJECTIONS

SCT objects to the following RFI:

TIEC 3-1

Please provide unredacted versions of all documents and communications produced in response to TIEC 2-12.

Objection

The material that is the subject of this Request is already the subject of a Motion to Compel filed by TIEC on April 20, 2016. Please see SCT's Response to TIEC's Motion to Compel filed on April 21, 2016 as well as SCT's Supplemental Response and attached affidavits filed on April 25, 2016. SCT objects to providing unreacted versions of all documents and communications produced in response to TIEC 2-12 because it would require SCT to (1) provide material that is outside the scope of TIEC's modified request and (2) it would require SCT to disclose privileged trade secret information that is competitively sensitive and would give a competitor an advantage if known.

V. CONCLUSION

For the foregoing reasons, SCT respectfully requests that its objections to TIEC's Third Set of RFIs be sustained and that SCT be granted such other relief to which it has shown itself entitled.

Respectfully submitted,

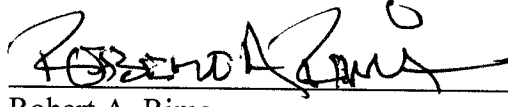


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CERTIFICATE OF SERVICE

I certify that a true and correct copy of this document was served on all parties of record in this proceeding, pursuant to SOAH Order No. 2, on April 26, 2016 by electronic mail, facsimile, hand-delivery, overnight delivery, or First Class U.S. Mail.



Robert A. Rima