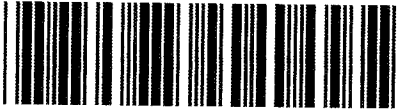


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**SOAH DOCKET NO. 473-16-2751
PUC DOCKET NO. 45624**

2016 MAR 23 PM 2: 22

**APPLICATION OF THE CITY OF
GARLAND TO AMEND A
CERTIFICATE OF CONVENIENCE
AND NECESSITY FOR THE RUSK TO
PANOLA DOUBLE-CIRCUIT 345-KV
TRANSMISSION LINE IN RUSK AND
PANOLA COUNTIES**

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**BEFORE THE UTILITY COMMISSION
FILING CLERK**

**STATE OFFICE OF
ADMINISTRATIVE HEARINGS**

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

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

I. INTRODUCTION

SCT received TIEC's First Set of RFIs on March 15, 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 RFIs:

TIEC 1-15

Where specifically will SCT's DC line terminate in SERC? To what utility will SCT interconnect that line in SERC?

Objection

SCT objects to this Request on the basis that it seeks information that is not relevant to this proceeding. *In re Nat'l Lloyds Ins. Co.*, 449 S.W.3d 486, 488 (Tex. 2014); TEX. R. CIV. P. 192.3(a); P.U.C. PROC. R. 22.141(a). The instant case is a CCN case for a 40-mile transmission line in Texas and does not involve SCT's interconnection or interconnections roughly 400 miles to the East in SERC.

SCT objects to disclosing where the SCT DC line will terminate in SERC because it would require SCT to disclose privileged trade secret information that is competitively sensitive and would give a competitor an advantage if known. As of the date of this filing, responsive information does not exist, however, SCT tenders this objection in accordance with Order No. 2, which requires objections to RFIs must be made within five working days of receipt of the RFI. SCT objects to providing a privilege log when and if responsive information becomes known because it would disclose information for which the trade secret privilege is being asserted.

SCT objects to identifying what utility SCT will interconnect to in SERC because it would require SCT to disclose privileged trade secret information that is competitively sensitive and would give a competitor an advantage if known. As of the date of this filing, responsive information does not exist, however, SCT tenders this objection in accordance with Order No. 2, which requires objections to RFIs must be made within five working days of receipt of the RFI. SCT objects to providing a privilege log when and if responsive information becomes known because it would disclose information for which the trade secret privilege is being asserted.

V. CONCLUSION

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

Respectfully submitted,

R.A. Rima *lra*
w/ permission

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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 March 23, 2016 by electronic mail, facsimile, hand-delivery, overnight delivery, or First Class U.S. Mail.

R.A. Rima *lra*
w/ permission
Robert A. Rima