



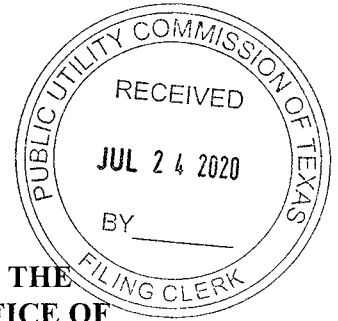
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SOAH DOCKET NO. 473-20-1118
PUC DOCKET NO. 49795



COMPLAINT OF PETTY GROUP, LLP §
AGAINST RIO GRANDE ELECTRIC §
COOPERATIVE, INC. §

BEFORE THE
STATE OFFICE OF
ADMINISTRATIVE HEARINGS

**PETTY GROUP, LLP'S MOTION FOR COMMISSION TO TAKE THE DEPOSITION
OF NAKEE LAWS**

TO THE HONORABLE ADMINISTRATIVE LAW JUDGES:

Pursuant to P.U.C. Proc. R. 22.143 and Tex. Gov't Code § 2001.094, Petty Group, LLP ("Petty") files this motion for the issuance of a commission to take the oral deposition of Mr. Nakee Laws, Vice President at Schneider Engineering, Ltd. ("Schneider"), an electric engineering consulting firm. Schneider produced a "Harmonic Distortion and Power Quality Analysis Report" for Rio Grande Electric Cooperative ("RGEC") dated August 27, 2018 regarding excess harmonic distortion Schneider measured on the RGEC system during the time period at issue in Petty's Complaint, and the likely causes of that harmonic distortion. Harmonic distortion at the Petty Ranch and the causes thereof are subjects of this proceeding. Schneider Engineering has also been identified by Rio Grande Electric Cooperative, Inc. as having knowledge of facts relevant to this matter.¹ Petty requests to take the oral deposition of Mr. Laws by agreement on August 17, 2020 at 9:30 a.m., remotely via teleconference pursuant to the Texas Supreme Court's Eighteenth Emergency Order Regarding the COVID-19 State of Disaster. This Motion is timely filed no later than five working days before the date of the deposition.² Petty further requests that Mr. Laws be

¹ Defendant Rio Grande Electric Cooperative, Inc.'s Responses to Plaintiff's Request for Disclosures, filed in the related matter *Petty Group, LLP v Rio Grande Electric Cooperative, Inc.*, Cause No. 2019CVK001348D1 in the District Court, 49th Judicial District, Webb County, Texas.

² P.U.C. Proc. R. 22.143(a).

required to produce certain documents, as described in the proposed Commission to Take Deposition and Subpoena Duces Tecum attached hereto.

REQUESTED RELIEF

For the reasons discussed herein, Petty respectfully requests this motion for commission to take the deposition of Mr. Laws and issuance of a subpoena duces tecum be granted and for such other relief to which it may be entitled.

Respectfully submitted,

JACKSON WALKER L.L.P.

By: /s/ Meghan E. Griffiths

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ATTORNEYS FOR PETTY GROUP, LLP

CERTIFICATE OF SERVICE

The undersigned hereby certifies that a copy of the forgoing was served on all parties of record in this proceeding on the 24th day of July, 2020 by hand delivery, facsimile, electronic mail, First Class U.S. Mail, or overnight delivery.

/s/ Jennifer Ferri
Jennifer Ferri

**SOAH DOCKET NO. 473-20-1118
PUC DOCKET NO. 49795**

COMPLAINT OF PETTY GROUP, LLP	§	BEFORE THE
AGAINST RIO GRANDE ELECTRIC	§	STATE OFFICE OF
COOPERATIVE, INC.	§	ADMINISTRATIVE HEARINGS

COMMISSION TO TAKE DEPOSITION AND SUBPOENA DUCES TECUM

TO ALL OFFICERS AUTHORIZED BY LAW TO TAKE DEPOSITIONS:

Petty Group, LLP, a party in this proceeding, has filed a written request for the issuance of a commission to take the deposition of Mr. Nakee Laws, a Vice President at Schneider Engineering, Ltd. (“Schneider”), to appear via teleconference on August 17, 2020 beginning at 9:30 a.m., then and there to be deposed before a certified court reporter, who shall take deponent’s answers under oath to the oral questions which are addressed to him.

Mr. Laws shall be deposed with respect to the above-styled docket now pending before the Public Utility Commission of Texas. By this commission, Mr. Laws is required to remain in attendance from day to day until the deposition is completed.

Mr. Nakee Laws is also required to produce electronic copies of the following:

1. All documents (whether in electronic or paper form) reviewed by or provided to Mr. Laws in preparation for his deposition.
2. All documents prepared by Schneider (whether in electronic or paper form), including notes, drafts, studies, calculations, spreadsheets, diagrams, correspondence, writings and recordings of any kind relating to the Harmonic Distortion and Power Quality Analysis Report dated August 27, 2018 (the “Harmonics Report”).
3. All communications between Schneider (including its employees, officers, directors, consultants, agents, attorneys, affiliates and anyone else purporting to act on its behalf) and Rio Grande Electric Cooperative, Inc. (including its employees, officers, directors, consultants, agents, attorneys, affiliates and anyone else purporting to act on its behalf) (“RGEC”), whether in electronic or paper form, regarding (1) the Harmonics Report or (2) harmonics on RGEC’s Brundage transmission line, including at the Petty Ranch.

Signed _____, 2020

Administrative Law Judge