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DOCKET NO. 49795

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

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**BEFORE THE
PUBLIC UTILITY COMMISSION
OF TEXAS**

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**RIO GRANDE ELECTRIC COOPERATIVE, INC.'S OBJECTIONS TO
PETTY GROUP, LLP'S FOURTH SET OF REQUESTS FOR INFORMATION**

TO: Petty Group, LLP, by and through their attorneys of record, Meghan Griffiths, Jennifer Ferri, Jackson Walker LLP, 1200 Congress Avenue, Suite 1100, Austin, Texas 78701.

COMES NOW, Rio Grande Electric Cooperative, Inc. ("RGE"), by and through their attorneys of record, and files these objections to Petty Group, LLP's Fourth Set of Requests for Information. RGE has negotiated these objections in good faith but was unable to reach an agreement with counsel for Petty Group LLP.

Respectfully submitted,

COZEN O'CONNOR

By: /s/ Tammy Shea

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**ATTORNEYS FOR RIO GRANDE
ELECTRIC COOPERATIVE, INC.**

CERTIFICATE OF SERVICE

I hereby certify that a copy of this document will be served on all parties of record on December 13, 2019 in accordance with 16 TAC § 22.74.

/s/ Tammy Shea

Tammy Shea

Petty 4-1: Please provide all documents, communications (including text messages), reports or studies related to power quality issues or harmonics issues at the Petty Ranch.

Objection:

RGEC objects to this request for information to the extent it seeks information protected by the attorney work produce and attorney client privileges, and the consulting only expert privilege.

Petty 4-2: Please provide all documents, communications (including text messages), reports or studies related to power quality issues or harmonics issues on the RGEC system.

Objection

RGEC objects to this request for information to the extent it seeks information protected by the attorney work produce and attorney client privileges, and the consulting only expert privilege.