



Control Number: 49795



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

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

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**BEFORE THE
PUBLIC UTILITY COMMISSION,
OF TEXAS**

**RIO GRANDE ELECTRIC COOPERATIVE, INC.'S RESPONSES 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. ("RGEC"), by and through their attorneys of record, and files these responses to Petty Group, LLP's Fourth Set of Requests for Information. RGEC stipulates that these responses may be treated as if filed under oath.

Respectfully submitted,

Shea & Associates

By: /s/ Tammy Shea

Tammy Wavle-Shea
State Bar No. 24008908
400 N Sam Houston Pkwy E, Suite 413
Houston, Texas 77060
Telephone: (832) 542.7824
Email: tshea@tshealaw.com

**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 January 10, 2019 in accordance with 16 TAC § 22.74.

/s/ Tammy Shea

Tammy Shea

PUBLIC UTILITY COMMISSION OF TEXAS

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

REQUEST NUMBER FOUR: QUESTION NO. PETTY 4-1

COMPANY NAME: Rio Grande Electric Cooperative, Inc.

INFORMATION REQUESTED:

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.

REQUESTED BY: Petty Group, LLP

RESPONSE:

See Response to RFI 1.10/1.19 and associated attachments. See also Confidential Attachment 4.1.

**DOCUMENTS RESPONSIVE TO THIS REQUEST ARE CONSIDERED
CONFIDENTIAL UNDER THE PROTECTIVE ORDER ISSUED IN THIS
CASE.**

SPONSOR:

Roger Andrade

PUBLIC UTILITY COMMISSION OF TEXAS

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

REQUEST NUMBER FOUR: QUESTION NO. PETTY 4-2

COMPANY NAME: Rio Grande Electric Cooperative, Inc.

INFORMATION REQUESTED:

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.

REQUESTED BY: Petty Group, LLP

RESPONSE:

See Response to RFI 1.10/1.19 and associated attachments. See also Confidential Attachment 4.1.

**DOCUMENTS RESPONSIVE TO THIS REQUEST ARE CONSIDERED
CONFIDENTIAL UNDER THE PROTECTIVE ORDER ISSUED IN THIS
CASE.**

SPONSOR:

Roger Andrade

PUBLIC UTILITY COMMISSION OF TEXAS

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REQUEST NUMBER FOUR: QUESTION NO. PETTY 4-3

COMPANY NAME: Rio Grande Electric Cooperative, Inc.

INFORMATION REQUESTED:

Petty 4-3: Please provide the complete file of Schneider Engineering related to the August 27, 2018 "Harmonic Distortion and Power Quality Analysis Report" prepared for RGEN.

REQUESTED BY: Petty Group, LLP

RESPONSE:

The only document in RGEN's possession regarding this report is the referenced report. See Response to RFI 1.9.

SPONSOR:

Roger Andrade

PUBLIC UTILITY COMMISSION OF TEXAS

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REQUEST NUMBER FOUR: QUESTION NO. PETTY 4-4

COMPANY NAME: Rio Grande Electric Cooperative, Inc.

INFORMATION REQUESTED:

Petty 4-4: Please provide the complete file of Robert Hurtig related to his May 8, 2019 report regarding "Petty Ranch Grubb Harmonic Analysis."

REQUESTED BY: Petty Group, LLP

RESPONSE:

The only document in RGEC's possession regarding this report is the referenced report. See Response to RFI 1.9.

SPONSOR:

Roger Andrade

PUBLIC UTILITY COMMISSION OF TEXAS

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REQUEST NUMBER FOUR: QUESTION NO. PETTY 4-5 .

COMPANY NAME: Rio Grande Electric Cooperative, Inc.

INFORMATION REQUESTED:

Petty 4-5: Please provide the complete file of Eaton relating to the October 2014 report on "Power Quality Measurements for Rio Grande Electric Cooperative, Inc."

REQUESTED BY: Petty Group, LLP

RESPONSE:

The only document in RGEC's possession regarding this report is the referenced report. See Response to RFI 1.9.

SPONSOR:

Roger Andrade

PUBLIC UTILITY COMMISSION OF TEXAS

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REQUEST NUMBER FOUR: QUESTION NO. PETTY 4-6

COMPANY NAME: Rio Grande Electric Cooperative, Inc.

INFORMATION REQUESTED:

Petty 4-6: Please provide all communications and documents relating to any complaint of any member of RGEC other than Petty relating to power quality on the Brundage Line.

REQUESTED BY: Petty Group, LLP

RESPONSE:

See Confidential Attachment 4.6.

**DOCUMENTS RESPONSIVE TO THIS REQUEST ARE CONSIDERED
CONFIDENTIAL UNDER THE PROTECTIVE ORDER ISSUED IN THIS
CASE.**

SPONSOR:

Roger Andrade

PUBLIC UTILITY COMMISSION OF TEXAS

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REQUEST NUMBER FOUR: QUESTION NO. PETTY 4-7

COMPANY NAME: Rio Grande Electric Cooperative, Inc.

INFORMATION REQUESTED:

Petty 4-7: Please provide all settlement agreements relating to any complaint of any member of RGEC other than Petty relating to power quality on the Brundage Line.

REQUESTED BY: Petty Group, LLP

RESPONSE:

None.

SPONSOR:

Roger Andrade

PUBLIC UTILITY COMMISSION OF TEXAS

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REQUEST NUMBER FOUR: QUESTION NO. PETTY 4-8

COMPANY NAME: Rio Grande Electric Cooperative, Inc.

INFORMATION REQUESTED:

Petty 4-8: For any testifying expert, please provide:

- (1) the expert's name, address, and telephone number;
- (2) the subject matter on which the expert will testify;
- (3) the general substance of the expert's mental impressions and opinions and a brief summary of the basis for them, or if the expert is not retained by, employed by, or otherwise subject to the control of the responding party, documents reflecting such information;
- (4) if the expert is retained by, employed by, or otherwise subject to the control of the responding party:
 - (A) all documents, tangible things, reports, models, or data compilations that have been provided to, reviewed by, or prepared by or for the expert in anticipation of the expert's testimony; and
 - (B) the expert's current resume and bibliography.

REQUESTED BY: Petty Group, LLP

RESPONSE:

See Response to RFI 1.1. RGEC will designate experts in accordance with the procedural schedule in this case.

SPONSOR:

Roger Andrade

PUBLIC UTILITY COMMISSION OF TEXAS

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REQUEST NUMBER FOUR: QUESTION NO. PETTY 4-9

COMPANY NAME: Rio Grande Electric Cooperative, Inc.

INFORMATION REQUESTED:

Petty 4-9: Please provide any indemnity and insuring agreements described in Rule 192.3(f).

REQUESTED BY: Petty Group, LLP

RESPONSE:

See Confidential Attachment 4.9.

SPONSOR:

Roger Andrade

PUBLIC UTILITY COMMISSION OF TEXAS

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REQUEST NUMBER FOUR: QUESTION NO. PETTY 4-10

COMPANY NAME: Rio Grande Electric Cooperative, Inc.

INFORMATION REQUESTED:

Petty 4-10: Please provide any settlement agreements described in Rule 192.3(g).

REQUESTED BY: Petty Group, LLP

RESPONSE:

See Response to RFI 1.1.

SPONSOR:

Roger Andrade

PUBLIC UTILITY COMMISSION OF TEXAS

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REQUEST NUMBER FOUR: QUESTION NO. PETTY 4-11

COMPANY NAME: Rio Grande Electric Cooperative, Inc.

INFORMATION REQUESTED:

Petty 4-11: Please provide any witness statements described in Rule 192.3(h).

REQUESTED BY: Petty Group, LLP

RESPONSE:

See Response to RFI 1.1.

SPONSOR:

Roger Andrade

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REQUEST NUMBER FOUR: QUESTION NO. PETTY 4-12

COMPANY NAME: Rio Grande Electric Cooperative, Inc.

INFORMATION REQUESTED:

Petty 4-12: Please identify the name, address and telephone number of any person who may be designated as a responsible third party.

REQUESTED BY: Petty Group, LLP

RESPONSE:

Chesapeake Energy Corporation
Designated Representative: Mario Reyes
P.O. Box 548806
Oklahoma City, OK 73154-8806-06
(832) 381-0923

NGL Choya Operating LP
Designated Representative: Tim Jurco
3773 Cherry Creek N. Dr. STE 1000
Denver, CO 80209
303-968-0887

SPONSOR:

Roger Andrade