



Control Number: 49795



Item Number: 61

Addendum StartPage: 0

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

AGREED MOTION TO MODIFY PROCEDURAL SCHEDULE, REQUEST FOR CONTINUANCE OF THE HEARING ON THE MERITS, AND REQUEST FOR EXPEDITED CONSIDERATION

Petty Group, LLP (“Petty”) files this Agreed Motion to Modify the Procedural Schedule and Request for Expedited Consideration on behalf of itself, Rio Grande Electric Cooperative (“RGEC”), and Public Utility Commission of Texas (“PUCT” or “Commission”) Staff (collectively, the “Parties”).

In order to provide additional time for the Parties to engage in discussions and discovery related to the complaint, the Parties request an extension to the remaining applicable deadlines in this docket, which are set forth in SOAH Order No. 3. The proposed changes have been agreed to by the Parties and no participant in this proceeding is prejudiced by these modifications.

Accordingly, the Parties propose the following new schedule:

<u>Event</u>	<u>Date</u>
Petty Group, LLP Direct Testimony	4/3/2020
Objections to Petty Group Direct Testimony	4/10/2020
Responses to Objections to Petty Direct	4/17/2020
Rio Grande Direct Testimony; last day for discovery, including depositions, on Petty Direct	4/24/2020
Objections to Rio Grande Direct	5/1/2020
Response to Objections to Rio Grande Direct	5/8/2020
Staff Direct Testimony	5/8/2020
Objections to Staff Direct; last day for discovery, including depositions, on Rio Grande Direct	5/15/2020
Response to Objections to Staff Direct	5/22/2020
Petty Rebuttal Testimony	5/29/2020
Last day for discovery, including depositions, on Staff Direct Testimony	5/29/2020

461

Objections to Petty Rebuttal	6/5/2020
Response to Objections to Petty Rebuttal	6/12/2020
Last day for discovery, including depositions, on Petty Rebuttal	6/19/2020
Hearing on the Merits¹	7/8/2020 – 7/10/2020

In light of the preceding, the Parties respectfully request that the Administrative Law Judge modify the procedural schedule consistent with the dates above.

Further, given the short time to the current testimony filing deadline for Petty on February 21, 2020, the Parties respectfully request expedited consideration of this motion to modify the procedural schedule. Such request is not sought for purposes of delay, but rather to ensure that all Parties have adequate time to review discovery and prepare their direct testimony.

Respectfully submitted,

JACKSON WALKER, LLP

/s/ Meghan Griffiths

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ATTORNEYS FOR PETTY GROUP, LLP

CERTIFICATE OF SERVICE

I certify that a copy of this document has been served on all parties of record on February 7, 2020 by first class mail and/or electronic mail.

/s/ Meghan Griffiths

Meghan Griffiths

¹ The Parties propose these dates for the Hearing on the Merits, subject to confirmation with the Administrative Law Judge's schedule. The Parties anticipate a three-day Hearing on the Merits.