

Complainant shall make timely amendment to any prior response if she obtains information which indicates that the response was incorrect when made or, though correct when made, is now incorrect in any material respect. For any request to which Complainant fails or refuses to furnish all or part of the requested information, she shall provide a written explanation of the specific grounds for her failure to completely and precisely respond.

Careful attention should be given to copied material to ensure that it is legible. When the requested information has been previously provided in this proceeding in the requested format, reference may be made to the specific location of that information in responding to this request.

1. Refer to your response to Staff's Initial Request for Information, Item 1, asserting that the service wire at issue had "fallen in the yard before."

a. Provide the date that the service wire at issue fell into your front yard.

b. Describe in specific detail the circumstances and contributing causes that produced the downed line.

c. Describe in specific detail any property damage that occurred as a result of the downed line.

d. Describe in specific detail any injuries to any persons that occurred as a result of the downed line.

2. Refer to your response to Staff's Initial Request for Information, Item 1, alleging that the service wire at issue "could easily" fall into your front yard. Provide

specific facts that support your allegation that the service wire “could easily” fall into your front yard.



Jeff Derouen
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Public Service Commission
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DATED NOV 10 2014

cc: Parties of Record

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