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LANSING, MICHIGAN 48933

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ERIC J. SCHNEIDEWIND

E-MAIL ejschneidewind@varnumlaw.com

August 10, 2006

Ms. Mary Jo Kunkle
Michigan Public Service Commission
6545 Mercantile Way
P.O. Box 30221
Lansing, MI 48909

Re: In the matter of the application of International Transmission Company,
d/b/a ITC Transmission, for a certificate of public convenience and
necessity for construction of a transmission line other than a major
transmission line, running through Genoa, Hartland, Oceola, Milford, and
Brighton Townships.

Case No. U-14861

Dear Ms. Kunkle:

Enclosed for filing regarding the above captioned matter please find Hartland Township's
Motion to Compel Discovery Responses from the International Transmission Company, Notice
of Hearing and Proof of Service.

If you have any questions please call me.

Very truly yours,

VARNUM, RIDDERING, SCHMIDT & HOWLETT LLP

Eric J. Schneidewind

EJS/mrr

cc: ALJ
parties

STATE OF MICHIGAN
BEFORE THE MICHIGAN PUBLIC SERVICE COMMISSION

In the matter of the application of)
International Transmission Company,)
d/b/a ITC Transmission, for a certificate of)
public convenience and necessity for)
construction of a transmission line other)
than a major transmission line, running)
through Genoa, Hartland, Oceola, Milford,)
and Brighton Townships.)
_____)

Case No. U-14861

HARTLAND TOWNSHIP'S MOTION TO COMPEL DISCOVERY RESPONSES
FROM INTERNATIONAL TRANSMISSION COMPANY

Hartland Township ("Hartland") by its attorneys Varnum Riddering Schmidt & Howlett LLP submits the following Motion to Compel Responses to Hartland's First Discovery Request to International Transmission Company ("ITC") pursuant to Rule 317 and 335 of the Michigan Public Service Commission ("Commission" or "MPSC") Rules of Practice and Procedure R460.17317 and R460.17335 and Michigan Court Rule 2.313. In support of its Motion Hartland hereby states:

1. On July 13, 2006 a prehearing conference was held in this matter presided over by Administrative Law Judge Mark Eyster ("ALJ"). At that prehearing conference, a schedule was established in this matter by mutual consent of the parties. 1 Tr 25-27. As part of that schedule, the parties agreed that discovery would be turned around in 10 calendar days/best efforts. Tr 27.
2. On July 28, 2006 Hartland served ITC and the other parties to this matter with their first discovery request. See Attachment A. Pursuant to the schedule established by the parties, a response was due August 9, 2006.

3. On August 9, 2006, the date that a response to the first discovery request was due, ITC counsel informed Hartland that certain of the Hartland discovery requests (Nos. 2, 3, 4 and 6B) requested information "is confidential and considered critical energy infrastructure information". See Attachment B. Hartland was asked to revise its questions so that so-called confidential information was not implicated.

4. On August 9, 2006 Hartland responded that it was disappointed that ITC counsel had failed to bring the issue of alleged confidentiality to its attention until the very day that discovery was due instead of notifying Hartland of this problem at an earlier date. Nonetheless, in an attempt to be cooperative, Hartland revised its discovery request to request information that is commonly available in other jurisdictions. See Attachment C.

5. On the morning of August 10, 2006, Hartland determined that no discovery responses whatsoever had been provided by ITC. Hartland sent a letter (attached) to ITC demanding an explanation and informing them that a Motion to Compel would be filed in the absence of a satisfactory response. See Attachment D.

6. In response to Hartland's letter demanding a response to its first discovery request, ITC informed Hartland that the object of this discovery, Mr. Thomas Vitez, "had been out of the office this entire time in a remote location with very little technology available." ITC further informed Hartland that they hoped to have a response by Monday (August 14, 2006). Attachment E.

7. The ITC response of August 10, 2006 is unacceptable on a factual basis because Mr. Vitez was present at the prehearing conference when his attorney agreed to the hearing schedule and discovery response turn around time. Mr. Vitez had actual knowledge that Hartland was likely to file discovery on or near the filing of the ITC Supplemental Testimony July 27, 2006. Either ITC should not have agreed to the schedule or Mr. Vitez should not have undertaken conflicting commitments. It is particularly disturbing that in the case of the alleged confidential information referenced in paragraph 3 above and failure to provide any discovery whatsoever on

August 9, ITC did not inform Hartland of any problem preventing a response until the actual date for response or in fact the day after the response due date when Hartland raised the issue. These actions do not indicate best efforts on the part of ITC to comply with the discovery schedule to which it agreed on July 13, 2006.

8. ITC has not alleged any reason that would have prevented Mr. Vitez from arranging his affairs so that he or other employees were available to provide the requested discovery. Nor has ITC bothered to explain why such a predictable event as Mr. Vitez's absence in a remote location was not anticipated or if it occurred without notice why it could not have informed Hartland of the need to revise the schedule in this matter. In short, ITC has not established that it has used best efforts to provide requested information in this matter.

9. Pursuant to Rule 317 of the Commission's Rules of Practice and Procedure R460.17317 parties are required to respond promptly and fully to relevant discovery requests. Michigan case precedent supports a policy of open and effective discovery practice. Schinkle v Schinkle, 225 Mich Ap 221; 663 NW2d 481 (2003). Hartland is scheduled to file Testimony on September 13, 2006. The delay of ITC in promptly responding to discovery may have the consequence of preventing Hartland from receiving two or more rounds of discovery prior to filing Testimony. Thus, the actions of ITC may prejudice the ability of Hartland to prepare its case and therefore may deprive the Commission of information needed to decide this matter of first impression.

WHEREFORE, as more fully set forth above, Hartland respectfully requests the ALJ set this matter for hearing pursuant to the attached Notice of Hearing (Attachment F) and that ITC be ordered to provide full and complete responses to the First Discovery Request of Hartland Township as amended August 9, 2006 and that the Commission grant such further relief as may be just and reasonable.

Respectfully submitted,

Varnum, Riddering, Schmidt & Howlett LLP
Attorneys for Hartland Township

August 10, 2006

By: _____
Eric J. Schneidewind (P20037)
The Victor Center, Suite 810
201 N. Washington Square
Lansing, Michigan 48933
517/482-6237

Attachments:

- A. Hartland First Discovery Request.
- B. ITC Memo to Eric Schneidewind 8/9/06.
- C. Hartland Revised Discovery.
- D. Hartland Memo to ITC re Motion to Compel.
- E. ITC Memo to Eric Schneidewind 8/10/06.
- F. Notice of Hearing.

Attachment A

Hartland Township's Motion To Compel Discovery Responses
From International Transmission Company

Case U-14861
August 10, 2006

STATE OF MICHIGAN
BEFORE THE MICHIGAN PUBLIC SERVICE COMMISSION

In the matter of the application of)
International Transmission Company,)
d/b/a ITC Transmission, for a certificate of)
public convenience and necessity for)
construction of a transmission line other)
than a major transmission line, running)
through Genoa, Hartland, Oceola, Milford,)
and Brighton Townships.)
_____)

Case No. U-14861

HARTLAND TOWNSHIP'S FIRST DISCOVERY REQUEST TO ITC

INSTRUCTIONS

These are blanket instructions which cover all of Hartland Township's discovery requests to ITC.

- a. Source for Response. If the response to a request comes from knowledge or correspondence, a writing, or written material furnished to the individual making the answer, or from a response by another employee or agent of ITC, or from an interview with an employee or agent of ITC then identify such correspondence, writing, or other material furnished to the individual answering, or the person interviewed by the individual answering, as the case may be.
- b. Individuals with Knowledge. For each answer, identify each individual employed or engaged by ITC who has knowledge of the information used to provide the answer. If there are more than three such individuals, identify the two who have the most direct knowledge and a third who is the highest level employee with direct or indirect knowledge.
- c. Assumptions. For each request, list all assumptions made by the individual answering the request.
- d. Claims of Privilege. If the attorney-client privilege, any other privilege, or work product protection is claimed with respect to any Interrogatory or Request for Production:

- (1) State the date of the document or communication;

- (2) Identify each author of the document or each individual who made the subject communication;
 - (3) identify each other person who prepared or participated in the preparation of the document if the privilege or work product protection is asserted with respect to a document;
 - (4) identify each person who received the document or communication;
 - (5) identify each person from whom the document or communication was received;
 - (6) state the present location of the document and all copies thereof if the privilege or work product protection is asserted with respect to a document;
 - (7) identify each person having custody or control of the document and all copies thereof if the privilege or work product protection is asserted with respect to a document; and
 - (8) provide sufficient further information concerning the document or communication and the circumstances of its preparation or occurrence to explain the claim of privilege or protection and to permit the adjudication of the propriety of the claim.
- e. Verification. In response to each request, state the name, title, and address of each individual answering.
- f. Lack of Information. If you do not have accurate information with respect to any request:
- (1) please so state;
 - (2) give your best estimate as to the matter inquired about; and
 - (3) identify each person you believe may have accurate information regarding the matter inquired about.
- g. Year. In all cases where a request seeks information by year or years, indicate whether the information is provided on a calendar or fiscal year or some other basis. If provided on a fiscal year basis, state the date on which each fiscal year begins and ends.
- h. Identify. "Identify" or "state the identity of" means as follows:
- (1) when used in reference to an individual person, to state:
 - (a) his/her full name,
 - (b) present or last known address,

- (c) telephone number,
 - (d) present or last known position and business affiliation, and
 - (e) position and business affiliations at the time in question;
- (2) when used in reference to any person other than an individual, to state:
- (a) the person's full name and present or last known address,
 - (b) type of entity (e.g., corporation, partnership, single proprietorship), and
 - (c) the names of the individual persons who are or were principals, agents or employees and who have knowledge of relevant facts;
- (3) when used in reference to a communication means to state:
- (a) its date,
 - (b) the place where it occurred,
 - (c) the type of communication (e.g., telephone conversation, meeting,),
 - (d) its substance;
 - (e) the identity of the person who made it,
 - (f) the identity of each person who received it and all other persons who were present;
- (4) when used in reference to a document means to state:
- (a) the date,
 - (b) the author or addresser,
 - (c) addressee and recipients of all copies,
 - (d) type of document (e.g., letter, memorandum, telegram, chart, photograph, brochure) or some other means of identifying it,
 - (e) its title, if any, and
 - (f) its present location or custodian.

If any document was, but no longer is, in your possession or subject to your control, state what disposition was made of it and the identity of the person you reasonably believe to be the present custodian.

i. Documents. The term "document" as used in Hartland Township's requests is used in its broad sense, and includes, without limitation, any kind of printed, recorded, written, graphic, computerized or photographic matter and things similar to any of the foregoing, regardless of their author or origin.

j. Communication.

(1) The term "communication" means any transmission of information by oral, graphic, written, pictorial, or otherwise perceptible means, including, but not limited to, telephone conversations, letters, telegrams, and personal conversations.

(2) A request seeking the identity of a communication addressing, relating or referring to, or discussing a specified matter encompasses documents having factual, contextual, or logical nexus to the matter, as well as communications in which explicit or implicit reference is made to the matter in the course of the communication.

k. QF. "QF" means a qualified facility under PURPA and FERC regulations.

l. Standby Service. Includes all situations where the customer desires the Company to serve load that is normally served by another source of electricity or by the customer's generator or prime mover. It specifically includes the definition of standby power in the regulations implementing the Federal Power Act Regulations and the Public Utility Regulatory Policies Act of 1978.

m. Confidential Business Information. If confidential business information is claimed with respect to the response to any Interrogatory or Request for Production:

- (1) State the basis for such claim;
- (2) Respond to the discovery by assigning a letter to each customer that will be used consistently throughout discovery responses; and
- (3) Provide the requested discovery using such letter designation rather than customer name to protect the alleged confidential business information.

INTERROGATORIES AND DOCUMENT REQUESTS

Request for Copies. Hartland Township adopts as its own each discovery request to ITC of each party in this matter. Please provide Hartland Township with copies of responses

(past, present, and future) to all such discovery requests at the time such responses are provided to the requesting party.

.....

1. Paragraph 19 of ITC's application states that the MPSC's "Capacity Needs Forum, currently being addressed in Case No. U-14231, clearly focuses on the need to upgrade the State of Michigan's transmission infrastructure."
 - A. Please provide the MPSC case number where the construction of the line which is the subject of this application is identified.
 - B. For the case or cases identified in 1A above, please provide the specific language in the MPSC order which acknowledges or approves the need for this specific transmission construction.
2. Please provide the construction plan and/or budgets in which ITC specifically identifies this project.
3. Provide current transmission maps and schematic diagrams for the ITC transmission system within the State of Michigan.
4. Identify the construction plans for the ITC transmission system for the years 2007, 2008, 2009 and 2010. For the purpose of this request, ITC need only supply information related to its current Michigan service territory.
 - A. Include maps identifying the anticipated routes of the planned construction.
 - B. Include system schematic diagrams which identify the planned construction.

5. Identify any impact on ITC's planned construction for the years in No. 4 caused by the acquisition of the METC by ITC.
6. In its Form 10-K filed with the United States Securities and Exchange Commission for the Fiscal Year ended December 31, 2005 on page 5, ITC states:

“ITC Transmission works closely with MISO in the development of ITC Transmission's annual system expansion plan by performing technical evaluations and detailed studies. As the regional planning, authority, MISO reviews regional system improvement projects by its members, including ITC Transmission.”

- A. Please provide all correspondence between ITC and the MISO (Midwest Independent Transmission System Operator) which specifically addresses this specific project, the need for this project and the alternative methods of satisfying the purported capacity needs which this project addresses.
- B. Please provide ITC Transmission's annual system expansion capital plan for the period covering the identification of need for this project.

Questions for Mr. Vitez

7. The MPSC's Michigan Energy Appraisal for 2006 issued May 5, 2006 at pp 3 & 4 discusses the supply situation for Michigan this summer. Both the MPSC and the MISO conclude, with purchases, Michigan's electric utilities in the lower peninsula should be able to meet this summer's requirements. No mention in the appraisal is made of inadequate transmission facilities.

Comparing that report to the testimony of ITC witness Vitez beginning at page 15 line 18 through page 17 line 21, is it correct to assume the line which is the subject of this

application is required to satisfy specific customer needs rather than a system-wide infrastructure requirement.

8. Based on the testimony identified in No. 7, it appears that the need for this construction is based on providing a second 120 kV line for the GM Milford Proving Grounds which was requested by Detroit Edison on September 28, 2005. On May 25, 2006, three business days prior to the filing of this application, Detroit Edison requested an ITC interconnection at its Hurst Substation to serve a new 120kV/41.6kV transformer at that location. This request was the culmination of informal discussions at quarterly Planning Committee meetings with DTE Energy (Vitez testimony page 15 lines 12-22.). Please provide any minutes, reports or other written information from the planning committee meetings referred to by ITC witness Vitez which specifically address the proposed line and its routing.
9. Please provide the following information concerning the location of the proposed transmission line as it relates to the testimony of ITC witness Vitez page 7 line 18 through page 9 line 7:
 - A. Where on the existing ITC Genoa-North Corridor will the line be located?
 - B. A copy of the permit or any other approvals which allowed existing transmission facilities to cross Interstate 96 in the area of the Genoa-North Corridor.
 - C. Where on public road right-of-way in Oceola Township will the line be located?
 - D. In Hartland Township along the M-59 right-of-way, where will the line be located?
 - E. On Pleasant Valley road right-of-way, where will the line be located?

- F. Maps which clearly show the location of the proposed line route on the rights-of-ways utilized.
 - G. Copies of franchises or other permits which permit ITC to locate within the public rights-of-way. Information related to any conditions associated with ITC's use of the public rights-of-way proposed by ITC.
10. On page 25 of 39 of witness Vitez's proposed Exhibit A-6, the response to Comment 163 and response were:

“Comment 163–Question as to whether there is an existing power line running along this project's chosen route.

Response to Comment 163–No. The line down M-59 will be new construction.”

Does this response mean there are no electric facilities within the M-59 right-of-way or there are no electric facilities in the vicinity of the M-59 right-of-way?

11. On page 4 of 39 of witness Vitez's proposed Exhibit A-4 the response to Comment 19 is:

“ITC is not allowed to drill and put holes in wetlands. ITC does not believe that there are any wetlands in the area”

Further on page 33 of 39 of witness Vitez's proposed Exhibit A-4 the response to Comment is:

“Response to comment 226–Underground lines cannot go through wetlands. ITC must go through 41 wetlands for this project....”

Which response sponsored by ITC witness Vitez is accurate?

12. Please provide a copy of the ITC permit application with the Department of Environmental Quality marked received February 23, 2006 including all attachments.
13. Do any ITC Holding Corp, ITC Transmission or any of its subsidiaries' employees reside on or in the vicinity of any of the alternate routes analyzed by ITC? If so, please identify those persons and their position and company affiliation.
14. If ITC were to construct a transmission line using the identical construction proposed in this application, single steel pole, and that line was to be located on private rights-of-way:
 - A. What width of right-of-way would ITC utilize?
 - B. Would rights-of-way be obtained by the use of easement or purchase in fee simple?
15. On page 10 lines 3-13 ITC witness Vitez rejects line routes along Hyne Road due to the existence of trees and need for private rights of way. Are there any existing electric supply facilities along or near Hyne Road?
16. Does ITC own or operate any single pole double circuit transmission facilities along Grand River Avenue in Livingston County?
17. Has or will General Motors make any contributions in aid of construction for the facilities which supply the second feed to its Milford Proving Grounds?
18. Has or will DTE/Detroit Edison make any contributions in aid of construction for the facilities associated with the interconnection to its Hurst Substation?

19. On page 19 of Exhibit A-6, question 120: Please provide a copy of all Michigan Department of Transportation documents in the possession of ITC which discuss or specify the plans to widen M-59 and the projected date that such widening will occur.

Question for Mr. Valburg

20. Does ITC believe the MPSC can rule specifically on the issue EMF dangers in this case?

Respectfully submitted,

Varnum, Riddering, Schmidt & Howlett LLP
Attorneys for Hartland Township

July 28, 2006

By: _____
Eric J. Schneidewind (P20037)
The Victor Center, Suite 810
201 N. Washington Square
Lansing, Michigan 48933
517/482-6237

Attachment B

Hartland Township's Motion To Compel Discovery Responses
From International Transmission Company

Case U-14861
August 10, 2006

Eric J. Schneidewind - U-14861: Hartland Township's First Discovery Request to ITC

From: "Soneral, Christine Mason" <CMason@dykema.com>
To: <ejschneidewind@varnumlaw.com>
Date: 8/9/2006 8:22 AM
Subject: U-14861: Hartland Township's First Discovery Request to ITC
CC: "Ernst, Albert" <AErnst@dykema.com>

Good morning Eric,

As we discussed on the telephone, a few of Hartland's discovery requests ask for information that is confidential and considered critical energy infrastructure information. Those requests include:

1. Request No. 2
2. Request No. 3
3. Request No. 4

Many of the requests are overly broad and do not relate to the specific project at hand. Is there a way that Hartland can revise its questions such that this confidential/CEII information is not implicated?

Thank you.

Christine Mason Soneral
Dykema
Capitol View
201 Townsend, Suite 900
Lansing, MI 48933

Notice from Dykema Gossett PLLC:

To comply with U.S. Treasury regulations, we advise you that any discussion of Federal tax issues in this communication was not intended or written to be used, and cannot be used, by any person (i) for the purpose of avoiding penalties that may be imposed by the Internal Revenue Service, or (ii) to promote, market or recommend to another party any matter addressed herein.

This Internet message may contain information that is privileged, confidential, and exempt from disclosure. It is intended for use only by the person to whom it is addressed. If you have received this in error, please (1) do not forward or use this information in any way; and (2) contact me immediately.

Neither this information block, the typed name of the sender, nor anything else in this message is intended to constitute an electronic signature unless a specific statement to the contrary is included in this message.

Attachment C

Hartland Township's Motion To Compel Discovery Responses
From International Transmission Company

Case U-14861
August 10, 2006

STATE OF MICHIGAN
BEFORE THE MICHIGAN PUBLIC SERVICE COMMISSION

In the matter of the application of)
International Transmission Company,)
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_____)

Case No. U-14861

**HARTLAND TOWNSHIP'S SECOND DISCOVERY REQUESTS TO ITC
IN LIEU OF FIRST REQUESTS NO. 2, 3, 4 AND 6B**

21. Please provide the date (year) of the ITC/MISO construction plan which first recommended the need for the transmission line which is the subject of this application.

22. Please provide current transmission system maps for the ITC transmission system within the State of Michigan. The requested maps need be in no more detail than those currently offered by:

- A. The Wisconsin Public Service Commission at
<http://psc.wi.gov/utilityinfo/maps/electricMaps.htm>
- B. Metadata: Electric Transmission Lines and Substations, 60 kilovolt and Greater, Minnesota (page 1-11) at
http://www.lmic.state.mn.us/chouse/metadate/elec_trasn03.html
- C. Platts InfoStore, Northeast Electric Power System 2005 Edition at:
<http://www.platts.com/infostore/>

Also please provide a current electric schematic diagram for the ITC system in Michigan.

23. Identify the construction plans for the ITC transmission system for the years 2007, 2008, 2009 and 2010. For the purpose of this request, ITC need only supply schematic diagrams of its system showing anticipated new construction or upgrading of the ITC transmission system physically located in Livingston County, Michigan.

Respectfully submitted,

Varnum, Riddering, Schmidt & Howlett LLP
Attorneys for Hartland Township

August 9, 2006

By: _____
Eric J. Schneidewind (P20037)
The Victor Center, Suite 810
201 N. Washington Square
Lansing, Michigan 48933
517/482-6237

Attachment D

Hartland Township's Motion To Compel Discovery Responses
From International Transmission Company

Case U-14861
August 10, 2006



201 N. WASHINGTON SQUARE • SUITE 810
LANSING, MICHIGAN 48933

TELEPHONE 517 / 482-6237 • FAX 517 / 482-6937 • WWW.VARNUMLAW.COM

ERIC J. SCHNEIDEWIND

E-MAIL ejschneidewind@varnumlaw.com

MEMORANDUM

**ATTORNEY – CLIENT COMMUNICATION ONLY
PRIVILEGED AND CONFIDENTIAL**

TO: Al Ernst and Christine Mason-Sonerai

FROM: Eric J. Schneidewind

RE: Overdue Discovery Response

DATE: August 10, 2006

This memo is to inform you that the ITC Response to Hartland Township's First Discovery Request is overdue. The parties to this case agreed to a 10 calendar day turnaround. In view of the fact that Hartland Township filed its Discovery on July 28, 2006 your Response was due August 9. Please indicate in writing today if you plan to file your Responses today. If not, I will file a Motion to Compel and/or a Motion to delay the schedule.

c. Parties
ALJ

Attachment E

Hartland Township's Motion To Compel Discovery Responses
From International Transmission Company

Case U-14861
August 10, 2006

From: "Soneral, Christine Mason" <CMason@dykema.com>
To: "Eric J. Schneidewind" <ejschneidewind@varnumlaw.com>, "Ernst, Albert" <AErnst@dykema.com>
Date: 8/10/2006 11:33:37 AM
Subject: RE: Overdue Discovery Response U-14861

Good morning Mr. Schneidewind,

Thank you for your correspondence.

The discovery questions are directed to Mr. Thomas Vitez, who has been out of the office this entire time in a remote location with very little technology available.

He has been making best efforts to pull together the information for the voluminous discovery requests.

Mr. Vitez returns to the office on Monday, although it is ITC's hope that he is able to finish responses before then. I will be able to advise you more fully late this afternoon.

I also will be able to advise you as to whether any critical energy infrastructure information is still implicated in light of the revised questions submitted by Hartland. I will be speaking with ITC's in-house legal counsel later this afternoon on this issue (I believe he returns to the office around 4 this afternoon).

We have had a cooperative and professional relationship with Hartland to date, and anticipate that it will continue.

As I indicated yesterday, I am not sure that it is appropriate to copy the ALJ on correspondence relating to discovery issues where there is no formal proceeding. My prior experience with discovery matters is that the parties do not correspond with the ALJ in this manner. I look to ALJ Eyster for guidance on this issue.

I will contact you later this afternoon when I have an update.

Regards,

Christine

-----Original Message-----

From: Eric J. Schneidewind [mailto:ejschneidewind@varnumlaw.com]
Sent: Thursday, August 10, 2006 10:19 AM
To: Ernst, Albert; Soneral, Christine Mason
Cc: Mike Watz; Hon. Mark Eyster; Kristin Smith
Subject: Overdue Discovery Response U-14861

Eric J. Schneidewind
Varnum, Riddering, Schmidt & Howlett, LLP
201 N. Washington Square, Suite 810

Attachment F

Hartland Township's Motion To Compel Discovery Responses
From International Transmission Company

Case U-14861
August 10, 2006

STATE OF MICHIGAN
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In the matter of the application of)
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Case No. U-14861

NOTICE OF HEARING

PLEASE TAKE NOTICE that Hartland Township's Motion to Compel Discovery Responses from International Transmission Company has been scheduled for hearing on August 21, 2006 at 9:00 AM or as soon as it may be heard.

Respectfully submitted,

Varnum, Riddering, Schmidt & Howlett LLP
Attorneys for Hartland Township

August 10, 2006

By: _____
Eric J. Schneidewind (P20037)
The Victor Center, Suite 810
201 N. Washington Square
Lansing, Michigan 48933
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STATE OF MICHIGAN
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Case No. U-14861

PROOF OF SERVICE

Monica Robinson, duly sworn, deposes and says that on this 10th day of August 2006 she served a copy of Hartland Township's Motion To Compel Discovery Responses From International Transmission Company and Notice of Hearing upon those individuals listed on the attached Service List by e-mail and regular mail at their last known addresses.

Monica Robinson

Subscribed and sworn to before me
this 10th day of August 2006.

Eric J. Schneidewind, Notary Public
Eaton County, Michigan
Acting in Ingham County, Michigan
My Commission Expires: April 24, 2012

Service List U-14861

Hon. Mark Eyster
Michigan Public Service Commission
P.O. Box 30221
Lansing, MI 48909
mdeyste@michigan.gov

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