

**STATE OF NORTH CAROLINA
UTILITIES COMMISSION
RALEIGH**

DOCKET NO. EC-23, SUB 50

BLUE RIDGE ELECTRIC)	
MEMBERSHIP CORPORATION)	
Petitioner,)	CHARTER COMMUNICATIONS
)	PROPERTIES LLC'S
v.)	OPPOSITION TO BLUE RIDGE
)	ELECTRIC MEMBERSHIP
CHARTER COMMUNICATIONS)	CORPORATION'S MOTION TO
PROPERTIES LLC,)	COMPEL DISCOVERY
)	
Respondent.)	

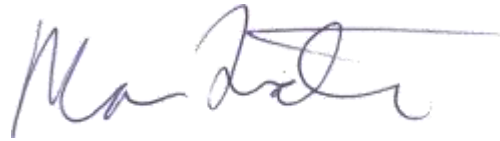
Charter Communications Properties LLC (“Charter”) respectfully submits this Opposition to Blue Ridge Electric Membership Corporation’s (“BREMC’s”) Motion to Compel Discovery, filed on September 18, 2017.

BREMC’s Motion was premature and unnecessary. Charter never refused to produce information responsive to Data Requests 21, 41, 43, 44, 45 and 51, as narrowed by agreement of the parties, and instead committed to producing this information. During the course of multiple conferences between the parties regarding the scope and breadth of BREMC’s First Set of Data Requests, Charter explained to BREMC that several requests, even after they were modified or limited in certain respects, were burdensome. Charter told BREMC from the outset that it would take time to identify, collect, and produce this information, and that it would do so on a rolling basis.

Charter has diligently addressed its discovery obligations. On September 20, 2017, Charter supplemented its initial responses and completed its document production for Requests 43, 44, 45 and 51. Charter further supplemented its initial responses and completed its document production for Requests 21 and 41 on September 29, 2017.

Charter has now fully and completely responded to the Requests that were the subject of BREMC's Motion. Accordingly, the Commission should deny BREMC's unnecessary Motion to Compel Discovery as moot.

Respectfully submitted, this 29th day of September, 2017.



Marcus W. Trathen
Brooks, Pierce, McLendon,
Humphrey & Leonard, LLP
Wells Fargo Capitol Center
150 Fayetteville Street, Suite 1700
Raleigh, NC 27601
(919) 839-0300
mtrathen@brookspierce.com

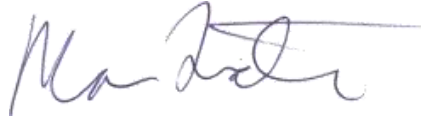
Gardner F. Gillespie
J. Aaron George
Carrie A. Ross
Sheppard Mullin Richter & Hampton LLC
2099 Pennsylvania Ave. NW, Suite 100
Washington, DC 20006
(202) 747-1900
ggillespie@sheppardmullin.com
ageorge@sheppardmullin.com
cross@sheppardmullin.com

*Attorneys for Respondent Charter
Communications Properties LLC.*

CERTIFICATE OF SERVICE

I certify that a copy of Charter Communications Properties LLC's Opposition to Blue Ridge Electric Membership Corporation Motion to Compel Discovery has been served by electronic mail on counsel of record in this proceeding.

This the 29th day of September, 2017.



*Attorney for Charter Communications
Properties LLC*