

**CENTRAL MAINE POWER COMPANY
OBJECTION TO INDUSTRIAL ENERGY CONSUMER GROUP'S DATA
REQUEST NO. 1
DOCKET No. 2008-255**

September 24, 2008

IECG-01-14

- Q.** Please provide all documents in the possession of CMP or Energy East which either: A) provide or describe the NERC guidelines; B) Evaluate the impact of the NERC Guidelines on the transmission needs of CMP or ISO-NE; C) Discuss or present alternative ways to interpret the NERC guidelines, either in general, or as applied to CMP or ISO-NE; or, D) Evaluate how other electric or transmission utilities have complied with or are attempting to comply with the NERC guidelines.
- A.** CMP objects to this data request on the grounds that it is overly broad, unduly vague and burdensome. CMP also objects to this request to the extent that it seeks information protected by the attorney-client privilege and the work product doctrine.

Objection Prepared and Submitted By:

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