

documents. Arkema intends to contact UP shortly to discuss ways to mitigate this discovery burden while still being responsive to UP's discovery requests. Once Arkema has narrowed the field of potentially responsive files to a reasonable level, it will begin production. Arkema will revise its estimate for completing production once it has made sufficient progress in culling these electronic files.

4. Estimate of Time to Address Concerns

There are no outstanding discovery concerns.

Respectfully submitted,

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Date: April 5, 2018

Certificate of Service

I certify that, on April 5, 2018, I caused a copy of the foregoing document to be served by e-mail on counsel for all parties of record in this proceeding and on the Honorable John P. Dring of the Federal Energy Regulatory Commission.

/s/ Jason D. Tutrone
Jason D. Tutrone