



Filing Receipt

Filing Date - 2023-08-03 01:46:21 PM

Control Number - 55067

Item Number - 1529

SOAH DOCKET NO. 473-23-21216
PUC DOCKET NO. 55067

APPLICATION OF ONCOR ELECTRIC	§	
DELIVERY COMPANY LLC TO	§	BEFORE THE STATE OFFICE
AMEND ITS CERTIFICATE OF	§	
CONVENIENCE AND NECESSITY	§	
FOR THE RAMHORN HILL –	§	OF
DUNHAM 345 KV TRANSMISSION	§	
LINE IN DENTON AND WISE	§	
COUNTIES	§	ADMINISTRATIVE HEARINGS
	§	

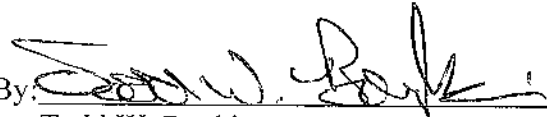
**ROSS ARTHUR BREWER RESPONSE TO EDGAR BRENT WATKINS AND MARY ANN
LIVENGOOD'S FIRST SET OF REQUESTS FOR INFORMATION**

TO: Edgar Brent Watkins and Mary Ann Livengood by and through their attorneys of record,
Christian Stewart and Tyler Topper, Morgan Williamson, LLP, 701 South Taylor, Suite
440, Amarillo, Texas 79101.

Pursuant to the Orders in this Docket, P.U.C. PROC.R.22.144, and other applicable
Commission rules, Ross Arthur Brewer hereby serves his Response to Edgar Brent Watkins and
Mary Ann Livengood's First Request for Information. The responses to these requests may be
treated as though provided under oath.

Respectfully Submitted,

UNDERWOOD LAW FIRM, P.C.
500 S. Taylor Street, Suite 1200
P. O. Box 9158
Amarillo, Texas 79105-9158
Telephone: (806) 376-5613
Facsimile: (806) 379-0316

By: 

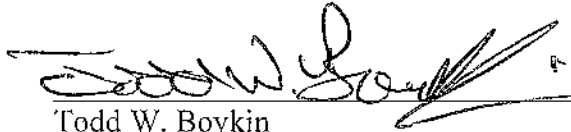
Todd W. Boykin
State Bar No. 02791600
todd.boykin@uwlaw.com

Lindsey Rusler
State Bar No. 24069080
lindsey.rusler@uwlaw.com
C. Jason Fenton
State Bar No. 24087505
jason.fenton@uwlaw.com

ATTORNEYS FOR LUIS B. TALAMANTE

CERTIFICATE OF SERVICE

I hereby certify that on August 3, 2023, the foregoing document is being electronically filed in the Public Utility Commission's Interchange system as required by Orders in this docket and in compliance with PUC Procedural Rule 22.74.


Todd W. Boykin

**EDGAR BRENT WATKINS AND MARY ANN LIVENGOOD'S FIRST REQUEST
FOR INFORMATION TO ROSS ARTHUR BREWER**

Watkins RFI No. 1-1. Please confirm that your property is not directly impacted by any of Segments V1-V3-V4.

Response: To the extent “directly impacted” is given the same definition as “directly affected” as described in PUC Procedural Rule 22.52(a)(3), we agree. However, if the definition of “directly impacted” is given a different definition, then the definition of “directly impacted” will need to be given in order to respond.

Watkins RFI No. 1-2. You have previously indicated your support for Route 179. This route utilizes Segment V2.

- a. Would you support or “not oppose” a modified version of Route 179 identified as “Route 179R” in the Direct Testimony of T. Brian Almon (Docket Item No. 1426) that uses Segments V1-V3-V4 instead of Segment V2?
- b. If you cannot agree to support or “not oppose” Route 179R, please explain why.

Response: Ross Arthur Brewer would not oppose use of the modified version of Route 179, identified as Route 179R in the Direct Testimony of T. Brian Almon (Docket Item No. 1426) that uses Segments V1-V3-V4 instead of Segment V2.

Watkins RFI No. 1-3. Please confirm that your property is not directly impacted by any of Segments M5-R2-R5-U3-V3-V4.

Response: To the extent “directly impacted” is given the same definition as “directly affected” as described in PUC Procedural Rule 22.52(a)(3), we agree. However, if the definition of “directly impacted” is given a different definition, then the definition of “directly impacted” will need to be given in order to respond.

Watkins RFI No. 1-4. You have previously indicated your support for Route 179. This route utilizes Segments M2-M3-R4-V2.

- a. Would you support or “not oppose” a modified version of Route 179 identified as “Route 179-Watkins” in the Direct Testimony of T. Brian Almon (Docket Item No. 1426) that uses Segments M5-R2-R5-U3-V3-V4 instead of Segments M2-M3-R4-V2?

- b. If you cannot agree to support or “not oppose” Route 179-Watkins, please explain why.

Response: Ross Arthur Brewer would not oppose use of the modified version of Route 179, identified as Route 179-Watkins in the Direct Testimony of T. Brian Almon (Docket Item No. 1426) that uses Segments M5-R2-R5-U3-V3-V4 instead of Segments M2-M3-R4-V2.