



Filing Receipt

Filing Date - 2023-08-04 08:50:45 AM

Control Number - 55067

Item Number - 1565

**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 | § | OF |
| THE RAMHORN HILL – DUNHAM 345 | § | |
| KV TRANSMISSION LINE IN DENTON | § | ADMINISTRATIVE HEARINGS |
| AND WISE COUNTIES | § | |

**TOWN OF NORTHLAKE’S RESPONSES
TO 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 counsel of record, Tyler Topper, Morgan & Williamson, LLP, 701 South Taylor, Suite 440, Amarillo, Texas 79101.

Intervenor Town of Northlake (“Northlake”) files this its Response to Edgar Brent Watkins and Mary Ann Livengood’s First Requests for Information (“RFIs”). Northlake’s written responses, including production of documents, if any, are attached hereto and incorporated by reference. These responses are made in the spirit of cooperation without waiving Northlake’s right to contest the admissibility of any of this information at hearing. Pursuant to P.U.C. PROC. R 22.144(c)(2)(A), each response lists the preparer or person under whose direct supervision the response was prepared and the sponsoring witness, if any. Pursuant to P.U.C. PROC. R 22.144(c)(2)(F), Northlake stipulates that its responses may be treated by all Parties as if they were made under oath. For purposes of these responses, Northlake uses the same definitions set out in Edgar Brent Watkins and Mary Ann Livengood’s RFIs. These responses may be supplemented if additional responsive documents are identified by Northlake.

Respectfully submitted,

/s/ *Stephen C. Dickman*

Stephen C. Dickman

State Bar No. 05836500

Law Office of Stephen C. Dickman

6005 Upvalley Run

Austin, Texas 78731

Telephone: (512) 922-7137

Facsimile: (512) 454-8495

Email: sdickmanlaw@att.net

**ATTORNEY FOR THE TOWN OF
NORTHLAKE**

CERTIFICATE OF SERVICE

The undersigned hereby certifies that, unless otherwise ordered by the presiding officer, notice of the filing of this document was provided to all parties of record via electronic mail on August 4, 2023 in accordance with the Order Suspending Rules issued in Project No. 50664.

/s/ *Stephen C. Dickman*

**NORTHLAKE RESPONSES TO
BRENT WATKINS AND MARY ANN LIVENGOOD'S
FIRST REQUESTS FOR INFORMATION**

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

Response: Confirmed.

Preparer: Stephen C. Dickman, Attorney for Town of Northlake and Drew Corn, Northlake City Manager

Sponsoring Witness: Undetermined at this time.

Watkins RFI No. 1-2. You have previously indicated your general support for Route 179 with several caveats (e.g., utilizing Segments C4-C6 instead of C7-E2-E1, etc.). Route 179 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, provided also that the caveats raised in your testimony are also adequately resolved?
- b. If you cannot agree to support or “not oppose” Route 179R (provided also that the caveats raised in your testimony are also adequately resolved), please explain why.

Response:

- a. Yes, Northlake would support or not oppose such modified “Route 179R” provided the caveats and route adjustments requested in Northlake’s testimony are followed or resolved.
- b. Not applicable per above response.

Preparer: Stephen C. Dickman, Attorney for Town of Northlake and Drew Corn, Northlake City Manager

Sponsoring Witness: Undetermined at this time.

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: Confirmed.

Preparer: Stephen C. Dickman, Attorney for Town of Northlake and Drew Corn, Northlake City Manager

Sponsoring Witness: Undetermined at this time.

Watkins RFI No. 1-4. You have previously indicated your general support for Route 179 with several caveats (e.g., utilizing Segments C4-C6 instead of C7-E2-E1, etc.). Route 179 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, provided also that the caveats raised in your testimony are also adequately resolved?
- b. If you cannot agree to support or “not oppose” Route 179-Watkins (provided also that the caveats raised in your testimony are also adequately resolved), please explain why.

Response:

- a. Yes, Northlake would support or not oppose such modified “Route 179-Watkins” provided the caveats and route adjustments requested in Northlake’s testimony are followed or resolved.
- b. Not applicable per above response.

Preparer: Stephen C. Dickman, Attorney for Town of Northlake and Drew Corn, Northlake City Manager

Sponsoring Witness: Undetermined at this time.