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CHARLES DEE AND GRETCHEN BROWN'S RESPONSE TO EDGAR BRENT WATKINS
AND MARY ANN LIVENGOOD'S FIRST SET OF REQUESTS FOR INFORMATION
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
§

**CHARLES DEE AND GRETCHEN BROWN'S 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, Charles Dee and Gretchen Brown hereby serves their 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,

Charles Dee and Gretchen Brown
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CERTIFICATE OF SERVICE

I hereby certify that on August 4, 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.

Gretchen Brown

CHARLES DEE AND GRETCHEN BROWN'S RESPONSE TO EDGAR BRENT WATKINS
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**EDGAR BRENT WATKINS AND MARY ANN LIVENGOOD'S FIRST SET OF
REQUESTS FOR INFORMATION TO CHARLES DEE AND GRETCHEN BROWN**

Watkins RFI No. 1-1. In the Direct Testimony of T. Brian Almon (Docket Item No. 1426), Mr. Almon identified a modified version of Route 179, which was identified as "Route 179R," consisting of the following combination of Segments: A0-A4-B1-B61-B62-C1-C21-C23-C7-E2-E1-E6-G1-G3-H41-H42-H8-I8-J3-K1-L5-L4-L3-L2-M1-M2-M3-R4-V1-V3-V4-Z.

- a. Please confirm that your property is not directly impacted by any of Route 179R.
- b. Would you support or "not oppose" Route 179R?
- c. If you cannot agree to support or "not oppose" Route 179R, please explain why.

Response:

- a. Our property is not directly impacted by any of Route 179R.
- b. We would not oppose Route 179R.
- c. n/a

Watkins RFI No. 1-2. In the Direct Testimony of T. Brian Almon (Docket Item No. 1426), Mr. Almon identified another modified version of Route 179, which was identified as "Route 179-Watkins," consisting of the following combination of Segments: A0-A4-B1-B61-B62-C1-C21-C23-C7-E2-E1-E6-G1-G3-H41-H42-H8-I8-J3-K1-L5-L4-L3-L2-M1-M5-R2-R5-U3-V3-V4-Z.

- a. Please confirm that your property is not directly impacted by any of Route 179-Watkins.
- b. Would you support or "not oppose" Route 179-Watkins?
- c. If you cannot agree to support or "not oppose" Route 179-Watkins, please explain why.

Response:

- a. Our property is not directly impacted by any of Route 179-Watkins.
- b. We would not oppose Route 179-Watkins.
- c. n/a