



Filing Receipt

Filing Date - 2023-08-07 12:29:52 AM

Control Number - 55067

Item Number - 1577

JAMES AND HOLLY LEWIS'S RESPONSE TO EDGAR BRENT WATKINS AND MARY ANN
LIVENGOOD'S FIRST SET OF REQUESTS FOR INFORMATION
SOAH DOCKET NO. 473-2321216
PUC DOCKET NO. 55067

**EDGAR BRENT WATKINS AND MARY ANN LIVENGOOD'S FIRST SET OF REQUESTS FOR
INFORMATION TO JAMES AND HOLLY LEWIS**

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. To the extent "directly impacted" is given the same definition as "directly affected" as described in Public Utility Commission Procedural Rule 22.52(a)(3), our property is directly impacted by Route 179R. However, if the definition of "directly impacted" is given a different definition, then the definition of "directly impacted" will need to be provided in order to respond completely.
- b. We oppose Route 179R.
- c. Route 179R contains segment J3 which directly impacts our property.

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. To the extent "directly impacted" is given the same definition as "directly affected" as described in Public Utility Commission Procedural Rule 22.52(a)(3), our

property is directly impacted by Route 179-Watkins. However, if the definition of “directly impacted” is given a different definition, then the definition of “directly impacted” will need to be provided in order to respond completely.

- b. We oppose Route 179-Watkins.
- c. Route 179-Watkins contains segment J3 which directly impacts our property.

CERTIFICATE OF SERVICE

We hereby certify that on August 7, 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. The responses to these requests may be treated as though provided under oath. Additionally, email copies will be forwarded to the representative attorneys.

James and Holly Lewis

1117 Denton Creek Drive

Justin, TX 76247

Jhlewis22@verizon.net