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

APPLICATION OF ONCOR ELECTRIC	§	BEFORE THE STATE OFFICE
DELIVERY LLC TO AMEND ITS	§	
CERTIFICATE OF CONVENIENCE	§	
AND NECESSITY FOR THE	§	OF
RAMHORN HILL - DUNHAM 345 KV	§	
TRANSMISSION LINE IN DENTON	§	
AND WISE COUNTIES	8	ADMINISTRATIVE HEARINGS

GRBK EDGEWOOD LLC AND GBTM SENDERA LLC'S RESPONSE TO EDGAR BRENT WATKINS AND MARY ANN LIVENGOOD'S FIRST REQUEST FOR INFORMATION

GRBK Edgewood LLC and GBTM Sendera LLC ("GRBK and GBTM") file this Response to the First Request for Information ("RFI") from Edgar Brent Watkins and Mary Ann Livengood ("Watkins"). Watkins served their RFIs on GRBK and GBTM on August 3, 2023 at 3:55 p.m. Pursuant to the discovery plan outlined in SOAH Order No. 2 issued in this docket on June 27, 2023, the deadline for GRBK and GBTM to respond to Watkins' First RFIs is August 11, 2023. Therefore, these responses are timely filed. GRBK and GBTM agree and stipulates that all parties may treat these responses as if the answers were filed under oath.

GRBK and GBTM file these responses without agreeing to the relevancy of the information sought and without waiving its right to object at the time of the hearing to the admissibility of information produced herein. Access to documents designated as Confidential or Highly Sensitive will be provided only upon execution and delivery of a Protective Order certification by the requesting parties, and access to such documents will be governed by the terms of a Protective Order entered in this docket.

rebuttal testimony.

¹ Pursuant to 16 Tex. Admin. Code § 22.144(b)(2), "[r]equests for information that are received after 3:00 p.m. shall be deemed to have been received the following business day." The discovery plan outlined in SOAH Order No. 2 established a deadline of five working days for responses to discovery requests regarding Intervenor direct and cross-

Respectfully submitted,

/s/ Hilary Liston

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CERTIFICATE OF SERVICE

I certify that a copy of this document was served on all parties of record on this date via the Commission's Interchange in accordance with the Commission's Second Order in Docket No. 50664 suspending PUC Procedural Rule 22.74.

/s/ Hilary Liston
Hilary Liston, Esq.

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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 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.

- 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 No. 1-1:

- a. Confirmed.
- b. Support.
- c. Not applicable.

Prepared by: Hilary Liston Title: General Counsel-Real Estate,
Green Brick Partners, Inc.

Sponsored by: Bobby Samuel Title: National Vice President of Land, Green

BrickPartners, Inc.; Vice President, GRBK

Edgewood LLC; and Management

Committee representative, GBTM Sendera

LLC