

# **Filing Receipt**

Filing Date - 2023-08-09 11:33:52 AM

Control Number - 55067

Item Number - 1588

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

BEFORE THE STATE OFFICE OF

ADMINISTRATIVE HEARINGS

## HILLWOOD PARTIES' RESPONSE TO EDGAR BRENT WATKINS AND MARY ANN LIVENGOOD WATKINS' FIRST REQUESTS FOR INFORMATION

Hillwood Parties ("Hillwood Parties") file this Response to Edgar Brent Watkins and Mary Ann Livengood Watkins' ("Watkins") First Requests for Information to Hillwood Parties. Hillwood Parties' response to requests for information shall be made within five (5) working days, making the responses due by August 10, 2023. This response is therefore timely. All parties may treat the answers as if they were filed under oath.

Hillwood Parties file these responses without agreeing to the relevancy of the information sought and without waiving their right to object at the time of the hearing to the admissibility of information produced herein.

#### Respectfully submitted,

**ENOCH KEVER PLLC** Andrew Kever State Bar No. 11367050 Carolyn E. Shellman State Bar No. 18196200 Christopher J. Kirby State Bar No. 24116620 7600 N. Capital of Texas Hwy Building B, Suite 200 Austin, Texas 78731 512-615-1201 (phone) 512-615-1198 (fax) akever@enochkever.com cshellman@enochkever.com ckirby@enochkever.com

Andrea By:

ATTORNEYS FOR HILLWOOD PARTIES

#### **CERTIFICATE OF SERVICE**

I certify that a copy of this document was served by electronic mail, on all parties of record in this proceeding on August 9, 2023, in accordance with SOAH Order No. 1 in the above-styled proceeding and the Commission's Second Order Suspending Rules, issued in Project No. 50664.

Lynn Needles

# HILLWOOD PARTIES' RESPONSE TO WATKINS' FIRST REQUEST FOR INFORMATION

# WATKINS—HILLWOOD 1-1:

Please confirm that your property is not directly impacted by any of Segments V1-V3-V4.

# **RESPONSE:**

We can confirm that Segments V1-V3-V4 do not cross property of the Hillwood Parties.

# HILLWOOD PARTIES' RESPONSE TO WATKINS' FIRST REQUEST FOR INFORMATION

# WATKINS—HILLWOOD 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:**

We support Route 179 as contemplated in Oncor's application. However, if the only difference between Route 179 and Mr. Almon's suggested Route 179R is that Segment V2 in Route 179 is replaced by Segments V1-V3-V4 in Route 179R, and if Oncor and the other parties were to accept Route 179R as the uncontested agreed settlement route, Hillwood Parties would not oppose the agreed settlement route.

# HILLWOOD PARTIES' RESPONSE TO WATKINS' FIRST REQUEST FOR INFORMATION

# WATKINS-HILLWOOD 1-3;

Please confirm that your property is not directly impacted by any of Segments M5-R2-R5-U3-V3-V4.

# **RESPONSE:**

We can confirm that Segments M5-R2-R5-U3-V3-V4 do not cross property of the Hillwood Parties.

# HILLWOOD PARTIES' RESPONSE TO WATKINS' FIRST REQUEST FOR INFORMATION

# WATKINS—HILLWOOD 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:**

We support Route 179 as contemplated in Oncor's application. However, if the only difference between Route 179 and Mr. Almon's suggested Route 179-Watkins is that Segment M2-M3-R4-V2 in Route 179 is replaced by Segments M5-R2-R5-U3-V3-V4 in Route 179-Watkins, and if Oncor and the other parties were to accept Route 179-Watkins as the uncontested agreed settlement route, Hillwood Parties would not oppose the agreed settlement route.