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

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| APPLICATION OF ONCOR ELECTRIC |
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| DELIVERY 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

#### FLOYD T. MCCURDY TESTAMENTARY TRUST'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, Tyler Topper and Christian Steward, 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, the Floyd T. McCurdy Testamentary Trust hereby serves their Responses to

Edgar Brent Watkins and Mary Ann Livengood's First Set of Requests for Information. The

responses to these questions may be treated as through provided under oath.

Respectfully submitted,

BRAUN & GRESHAM, PLLC P.O. Box 1148 (Mailing) Dripping Springs, Texas 78620 512-894-5426 (telephone) 512-894-3405 (fax)

/s/Patrick L. Reznik Patrick L. Reznik State Bar No. 16806780 preznik@braungresham.com Carly Barton State Bar No. 24086063 cbarton@braungresham.com

# ATTORNEYS FOR FLOYD T. MCCURDY TESTAMENTARY TRUST

# **CERTIFICATE OF SERVICE**

I certify that a true and correct copy of the foregoing document was served on all parties and counsel of record on August 9, 2023, in accordance with PUC Procedural Rule 22.74 and Orders issued in Docket No. 55067 to date.

/s/Patrick L. Reznik Patrick L. Reznik

Floyd T. McCurdy Testamentary Trust'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 Page 2

# FLOYD T. MCCURDY TESTAMENTARY TRUST'S RESPONSE TO EDGAR BRENT WATKINS AND MARY ANN LIVENGOOD'S FIRST SET OF 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.

Prepared by: Patrick L. Reznik Sponsored by: Floyd T. McCurdy Testamentary Trust

Watkins RFI No. 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:** Yes.

Prepared by: Patrick L. Reznik Sponsored by: Floyd T. McCurdy Testamentary Trust

**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.

Prepared by: Patrick L. Reznik Sponsored by: Margret Chavez

Watkins RFI No. 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?

Floyd T. McCurdy Testamentary Trust'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 Page 3 b. If you cannot agree to support or "not oppose" Route 179-Watkins, please explain why.

# **RESPONSE:** Yes.

Prepared by: Patrick L. Reznik Sponsored by: Floyd T. McCurdy Testamentary Trust