



## **Filing Receipt**

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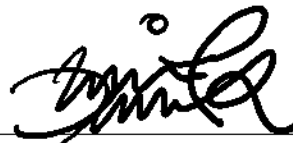
<b>APPLICATION OF ONCOR ELECTRIC DELIVERY COMPANY LLC TO AMEND ITS CERTIFICATE OF CONVENIENCE AND NECESSITY FOR THE RAMHORN HILL - DUNHAM 345 KV TRANSMISSION LINE IN DENTON AND WISE COUNTIES</b>	<b>§ § § § § § §</b>	<b>BEFORE THE STATE OFFICE     OF    ADMINISTRATIVE HEARINGS</b>
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**DANIEL DENNIS' 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 Stewart, Morgan & Williamson, LLP, 701 South Taylor, Suite 440, Amarillo, Texas 79101

Pursuant to the Orders in this Docket, PUC Procedural Rule 22.144, and other applicable Commission rules, Daniel Dennis hereby serves his 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,



\_\_\_\_\_  
Daniel Dennis

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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 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 specific definition as "directly affected" as described in PUC Procedural Rule 22.52(a)(3), I can confirm my property would not be directly impacted by any of Route 179R. However, if the definition of "directly impacted" is given a definition to include effects that are directly tied to the construction of these lines, then I cannot confirm my property is not directly impacted by any of Route 179R.
- b. I would not support Route 179R.
- c. I cannot support Route 179R, because it consists of the following Segments: J3, I8 and H8, that still go through and/or run adjacent to the City of Justin and will be between 4,300-4,400 ft from my property. Justin is a small town and these lines will be a huge detractor to the aesthetics of this city, and will negatively affect property values in the area. Route 164 seems to be the most logical route with the least impact on habitable structures within 500 feet of the line. I would support a modified version of Route 164 or any other route, to include a modification of Route 179, that doesn't include the afore-mentioned Segments.

**Sponsoring Witness:** Daniel Dennis

**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 specific definition as "directly affected" as described in PUC Procedural Rule 22.52(a)(3), I can confirm my property would not be directly impacted by any of Route 179-Watkins. However, if the definition of "directly impacted" is given a definition to include effects that are directly tied to the construction of these lines, then I cannot confirm my property is not directly impacted by any of Route 179-Watkins.
- b. I would not support Route 179-Watkins.
- c. I cannot support Route 179-Watkins, because it consists of the following Segments: J3, I8 and H8, that still go through and/or run adjacent to the City of Justin and will be between 4,300-4,400 ft from my property. Justin is a small town and these lines will be a huge detractor to the aesthetics of this city, and will negatively affect property values in the area. Route 164 seems to be the most logical route with the least impact on habitable structures within 500 feet of the line. I would support a modified version of Route 164 or any other route, to include a modification of Route 179, that doesn't include the aforementioned Segments.

**Sponsoring Witness:** Daniel Dennis

**CERTIFICATE OF SERVICE**

I hereby certify that on August 9, 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.

A handwritten signature in black ink, appearing to read "Daniel Dennis", is written over a horizontal line.

Daniel Dennis