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

PUBLIC UTILITY COMMISSION

OF TEXAS

HENRY NORTHLAKE DEVELOPMENT LLC'S RESPONSE TO EDGAR BRENT WATKINS AND MARY ANN LIVENGOOD'S FIRST REQUEST FOR INFORMATION

TO THE PUBLIC UTILITY COMMISSION OF TEXAS:

NOW COMES Henry Northlake Development LLC and files this Response to Edgar Brent

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

Henry Northlake Development files the responses below 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 provided 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 any Protective Order entered in this docket.

I. <u>RESPONSES</u>

Watkins RFI No. 1-1. Please confirm that your property is not directly impacted by any of Segments V1-V3-V4. **Response:**

Confirmed.

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:**

- a. Not opposed.
- b. N/A

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.

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?

b. If you cannot agree to support or "not oppose" Route 179-Watkins, please explain why. **Response:**

- a. Not opposed.
- b. N/A

Respectfully submitted,

s/ Christopher M. Lowry

Christopher M. Lowry State Bar No. 24093626 Parker Square Town Center 900 Parker Square, Suite 250 Flower Mound, Texas 75028 (972) 885-6998 Telephone clowry@henryinvestmentgroup.com ATTORNEY FOR INTERVENOR HENRY NORTHLAKE DEVELOPMENT LLC

CERTIFICATE OF SERVICE

I hereby certify that on August 9, 2023, a true and correct copy of the foregoing instrument. was served on all parties of record by electronic mail.

<u>s/ Christopher M. Lowry</u> Christopher M. Lowry