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SHAWN WELLS 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, Christian Stewart and Tyler Topper, 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, Shawn Wells 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.

EDGAR BRENT WATKINS AND MARY ANN LIVENGOOD'S FIRST SET OF REQUESTS FOR INFORMATION TO SHAWN WELLS

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

Response: To the extent "directly impacted" is given the same definition as "directly affected" as described in PUC Procedural Rule 22.52(a)(3), I agree. However, if the definition of "directly impacted" is given a different definition, then the definition of "directly impacted" will need to be given in order to respond.

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: I would not oppose use of the 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,

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: To the extent "directly impacted" is given the same definition as "directly affected" as described in PUC Procedural Rule 22.52(a)(3), I agree. However, if the definition of "directly impacted" is given a different definition, then the definition of "directly impacted" will need to be given in order to respond.

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: I would not oppose use of the 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.