



## **Filing Receipt**

**Filing Date - 2023-08-10 11:17:30 PM**

**Control Number - 55067**

**Item Number - 1627**

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

<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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**ITS 3.8, LLC’S RESPONSE TO EDGAR BRENT WATKINS AND MARY ANN  
LIVENGOOD’S FIRST SET OF REQUESTS FOR INFORMATION**

JTS 3.8, LLC (“JTS”) files this Response to Edgar Brent Watkins and Mary Ann Livengood (“Watkins”) First Request for Information to JTS. JTS’ response to request for information shall be made within five (5) working days making the response due by August 10, 2023. This response is therefore timely. All parties may treat the answers as if they were filed under oath.

JTS files these responses in the spirit of cooperation 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,

JTs 3.8, LLC  
365 MIRON DRIVE, SUITE A  
SOUTHLAKE, TX 76092  
Telephone: (817) 416-3981

By: /s/ Peter J. Wangoe II  
Peter J. Wangoe II

**CERTIFICATE OF SERVICE**

I certify a copy of this document is being filed in the Public Utility Commission's Interchange System and served on all parties of record in this proceeding on August 10, 2023, in accordance with SOAH Order No. 1 in the above proceeding and the Commission's Second Order Suspending Rules, in Project No. 50664.

By: /s/ Peter J. Wangoe II  
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Peter J. Wangoe II

**EDGAR BRENT WATKINS AND MARY ANN LIVENGOOD'S FIRST SET OF  
REQUESTS FOR INFORMATION TO JTS 3.8, LLC**

**Watkins – JTS RFI No. 1-1:**

- a. Please confirm that your property is not directly impacted by any of Route 179R.

**Response:**

I confirm that Route 179R does not cross property of JTS.

Sponsor: Peter J. Wangoe II

**Watkins – JTS RFI No. 1-1:**

- 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:**

I do not support Segments C7 and E2 of Route 179R. I object to running the proposed lines through the Canyon Falls green space for the same reasons I object to running them through Segment J4 across Trail Creek and Bishop Park in Justin. The negative environmental impacts on wildlife and the aesthetic beauty of the Canyon Falls green space. However, if the only difference between Route 179 and Route 179R is the Segment V2 in Route 179 is replaced with Segments V1-V3-V4 in Route 179R and Segments C7 and E2 were to be replaced with Segments to their south along 1171, and if Oncor and the other parties were to accept that revised Route 179R as the uncontested agreed settlement route, JTS would not oppose the agreement settlement route.

Sponsor: Peter J. Wangoe II

**Watkins - JTS RFI No. 1-2:**

- a. Please confirm that your property is not directly impacted by any of Route 179-Watkins.

**Response:**

I confirm that Route 179-Watkins does not cross property of JTS.

Sponsor: Peter J. Wangoe II

**Watkins - JTS RFI No. 1-2:**

- 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:**

I do not support Segments C7 and E2 of Route 179-Watkins. I object to running the proposed lines through the Canyon Falls green space for the same reasons I object to running them through Segment J4 across Trail Creek and Bishop Park in Justin. The negative environmental impacts on wildlife and the aesthetic beauty of the Canyon Falls green space. However, if the only difference between Route 179 and Route 179-Watkins is the Segments M2-M3-R4-V2 in Route 179 are replaced with Segments M5-R2-R5-U3-V3-V4 in Route 179-Watkins and Segments C7 and E2 were to be replaced with Segments to their south along 1171, and if Oncor and the other parties were to accept that revised Route 179-Watkins as the uncontested agreed settlement route, JTS would not oppose the agreement settlement route.

Sponsor: Peter J. Wangoe II