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

**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**

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**BEFORE THE STATE
OFFICE**

OF

**ADMINISTRATIVE
HEARINGS**

**TIMOTHY SIMMONS RESPONSE TO EDGAR BRENT WATKINS AND MARY ANN
LIVENGOOD’S FIRST SET OF REQUESTS FOR INFORMATION**

Timothy Simmons files this response to the First Request for Information from Edgar Brent Watkins and Mary Ann Livengood. Timothy Simmons agrees and stipulates that all parties may treat her response as if the answer were filed under oath.

SIGNED this 10th day of August, 2023

By: /s/ Timothy Simmons

Timothy simmons
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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.

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.

b. Would you support or “not oppose” Route 179R?

Response: I would not support and would oppose Route 179R

c. If you cannot agree to support or “not oppose” Route 179R, please explain why.

Response: On the basis of principal and my belief that the current transmission lines should not be near or around neighborhoods, I would not support and would oppose Route 179R. However, I do not have disagreement with the proposed modified segments by T. Brian Almon, but on the basis that line segment J3 is included in Route 179R.

Watkins RFI No. 1-2. 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 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.

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.

b. Would you support or “not oppose” Route 179-Watkins?

Response: I would not support and would oppose Route 179-Watkins.

c. If you cannot agree to support or “not oppose” Route 179-Watkins, please explain why.

Response: On the basis of principal and my belief that the current transmission lines should not be near or around neighborhoods, I would not support and would oppose Route 179-Watkins. However, I do not have disagreement with the proposed modified segments by T. Brian Almon, but on the basis that line segment J3 is included in Route 179-Watkins.