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SOAH DOCKET NO. 473-23-21216

PUC DOCKET NO. 55067


APPLICATION OF ONCOR ELECTRIC	§	BEFORE THE STATE OFFICE
DELIVERY COMPANY LLC TO	§	
AMEND ITS CERTIFICATE OF	§	
CONVENIENCE AND NECESSITY FOR	§	OF
THE RAMHORN HILL – DUNHAM 345	§	
KV TRANSMISSION LINE IN DENTON	§	
AND WISE COUNTIES	§	ADMINISTRATIVE HEARINGS

**REBUTTAL TESTIMONY OF T. BRIAN ALMON ON BEHALF OF EDGAR BRENT
WATKINS AND MARY ANN LIVENGOOD, CO-TRUSTEES OF THE WATKINS FAMILY
TRUST**

Intervenors Edgar Brent Watkins and Mary Ann Livengood, Co-Trustees of the Watkins Family Trust, file this Rebuttal Testimony of T. Brian Almon, which is attached, and stipulate that this Rebuttal Testimony can be treated by all parties as if the answers were filed under oath.

Respectfully Submitted,

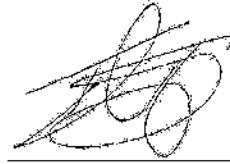
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**ATTORNEYS FOR EDGAR BRENT
WATKINS AND MARY ANN LIVENGOOD,
CO-TRUSTEES OF THE WATKINS FAMILY
TRUST**

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 as required by orders in this docket, the Commission's rules, and the Commission's First and Second Orders Suspending Rules issued on March 16, 2020 and July 16, 2020, in Project No. 50664.

A handwritten signature in black ink, appearing to be 'Tyler Topper', written over a horizontal line.

Tyler Topper

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DELIVERY LLC TO AMEND ITS	§	
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HILL-DUNHAM 345 KV	§	
TRANSMISSION LINE IN DENTON	§	
AND WISE COUNTIES	§	ADMINISTRATIVE HEARINGS

REBUTTAL TESTIMONY

OF

T. BRIAN ALMON

ON BEHALF OF

**EDGAR BRENT WATKINS AND MARY ANN LIVENGOD,
CO-TRUSTEES OF THE WATKINS FAMILY TRUST**

AUGUST 14, 2023

REBUTTAL TESTIMONY OF T. BRIAN ALMON

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WORKPAPERS - RFI responses, Joint Resolution

1 **I. INTRODUCTION**

2 **Q. Are you the same T. Brian Almon who previously filed testimony in this proceeding**
3 **on behalf of Edgar Brent Watkins and Mary Ann Livengood, Co-trustees of the**
4 **Watkins Family Trust?**

5 A. Yes. I previously filed direct testimony on July 31, 2023.

6 **Q. After reviewing the other parties' testimony, did you find any facts that led you to**
7 **alter the conclusions you made in your direct testimony?**

8 A. No. I still conclude that Alternative Route 179-Watkins best addresses the requirements
9 of PURA and the PUCT Substantive Rules when compared to Oncor's "best-meets" Route
10 179. Also, I still conclude that Alternative Route 179R provides a route that is shorter and
11 has a higher percentage of the length following existing compatible rights-of-way than
12 Route 179. My conclusion that the combination of links V1, V3, and V4 should be used
13 in place of link V2 in any route selected by the Judges and Commission remains the same
14 in this testimony.

15 **Q. What is the purpose of your rebuttal testimony?**

16 A. My rebuttal provides additional information to support my conclusion that Route 179-
17 Watkins best addresses the requirements of PURA and the Commission Substantive Rules
18 when compared to Route 179.

19 **Q. How is your testimony organized?**

20 A. My testimony first addresses the direct testimony of Brian Motsenbocker on behalf of
21 Intervenor PMB Capital Investments. Second, my testimony addresses the opinions of
22 parties who initially either supported or did not oppose Route 179 but who now also support
23 or do not oppose my recommended Routes 179-Watkins and 179R. My testimony

concludes with a discussion of the stated positions of several local municipalities concerning their joint “regionally preferred route.”

Q. What do you rely upon to reach your conclusions related to the issues raised by other parties in this proceeding?

A. I rely upon the Application, Testimony, Responses to Requests for Information (RFIs) filed by Oncor and the other parties, and my personal knowledge gained from my experience at the Commission and as an electric transmission siting consultant.

II. DISCUSSION OF TESTIMONIES

Q. What is the position of PMB Capital Investments (“PMB”) in this case?

A. PMB requests that the Commission approve Route 179.¹

Q Does PMB have an alternative request?

A. As an alternative, PMB requests that the Commission approve a route that includes the following link combinations: Z-V4-V3 or Z-V4-X-W7-W5. Route 179-Watkins and Route 179R both utilize Segments Z-V4-V3.²

Q. Why does PMB recommend the combination of Z-V4-V3 as an alternative?

A. PMB recommends this alternative because it would be less harmful than a route containing Link W3 or Link W4.³ PMB’s direct testimony indicates that PMB’s primary concerns are to avoid Links W3 and W4.

Q. Were PMB’s routing preferences taken into account in the Environmental Assessment?

¹ PMB Capital Investments DTI, Page 3 (Item No. 1419).

² *Id.*

³ PMB Capital Investments DTI, Page 9 (Item No. 1419).

1 A. Yes. Here is an excerpt from the EA specifically discussing PMB’s preferred options and
2 showing that PMB’s future development plans around Segments Z-V4-V3 are “somewhat
3 fluid at this juncture” and “can be reconfigured without much loss of rentable square
4 footage”.⁴

⁴ EA, Page 5-16.



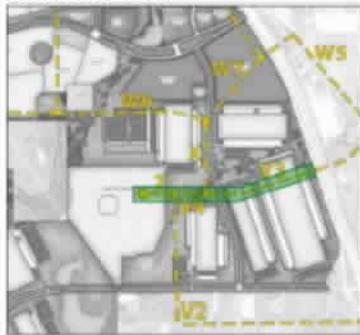
PMB Capital Investments

Rolling V Ranch is an approximately 3,700-acre planned development that will be located southwest of SH 114/US 287 near the City of Rhome. The first two phases of the development have recently been completed. Ultimate build-out will include residential, industrial, retail, and office space. As shown in graphics prepared by PMB Capital Investments shown below, the proposed Ramhorn Hill Switch was integrated into the original ranch master plan. The following progressions to the Link Z terminus were identified as the preferred options for the landowner, along with supporting reasons provided in the correspondence.

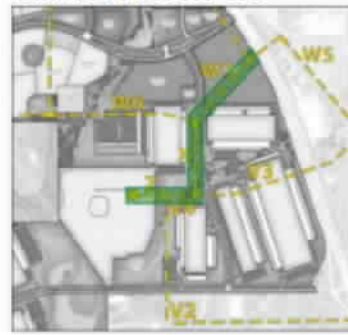
Links Z-V2



Links Z-V4-V3



Links Z-V4-X-W7-W5



Note: Provided notes for each area are summaries excerpted from landowner feedback.

- They will cause the least amount of disturbance since they are the furthest from existing development activity and new homeowners.
- Oncor's contractors can easily access these areas from US 287 and Ramhorn Hill Road during construction.
- The specific building footprints of the industrial structures depicted in this area are still somewhat fluid at this juncture. The Owner feels it can reconfigure these buildings around one of the three preferred Transmission Line routes without much loss of rentable square footage.

Q. The statements referenced above in the EA appear to indicate it may be some time before PMB develops the relatively small portion of its overall property near Links

1 **Z-V4-V3. Does PMB make any additional statements about how long PMB expects it**
2 **to take to develop its property?**

3 A. Yes. PMB states in its direct testimony that it “expects the PMB Property to take roughly
4 30 years to develop.”⁵

5 **Q. Have some intervenors in this proceeding previously indicated either support for or**
6 **non-opposition to Route 179?**

7 A. Yes.

8 **Q. Did these intervenors that indicated either support for or non-opposition to Route 179**
9 **have the opportunity to also consider your recommended routes, Route 179-Watkins**
10 **and Route 179R, before they filed their direct testimonies or statements of position?**

11 A. No. Since I filed my recommendations at the same time as other parties, they did not have
12 the opportunity to examine or take any position concerning Route 179-Watkins or Route
13 179R.

14 **Q. Did the intervenors in this proceeding have the opportunity to take a position**
15 **concerning your recommended routes after you filed your direct testimony?**

16 A. Through the Request-for-Information process, the intervenors who indicated either support
17 for or non-opposition to Route 179 were given the opportunity to consider and take a
18 position on Routes 179-Watkins and 179R. Additionally, a number of intervenors whose
19 positions regarding Route 179 were not clear were also sent Requests for Information. The
20 responses to our various Requests for Information are attached to my testimony as Exhibit
21 “A”.

22 **Q. Which intervenors received Requests for Information concerning your Routes 179-**
23 **Watkins and/or 179R?**

⁵ PMB Capital Investments DT, Page 4 (Item No. 1419).

1 A. These are the intervenors who received Requests for Information:

- 2 • Furst Ranch Intervenors
- 3 • Dennis Tolleson
- 4 • Joanna and Jeremy Girard
- 5 • Matthew Spaethe
- 6 • GFAT, LLC
- 7 • Margaret Chavez
- 8 • David Bratton
- 9 • Jerry Bratton
- 10 • Bill Beverly
- 11 • Janet Beverly
- 12 • Keith Norris
- 13 • Martin Rojas
- 14 • Michael Hamilton
- 15 • Rama Prasad Chalasani
- 16 • DHL Supply Chain
- 17 • J L Logan Properties
- 18 • Deborah M. Atchley, Trustee
- 19 • Bud and Micky Logan Properties
- 20 • Floyd T. McCurdy Testamentary Trust
- 21 • Peggy Logan McCurdy
- 22 • New Dimension Investments II, LLC
- 23 • Henry Northlake Development, LLC
- 24 • Shawn Wells

- 1 • Hillwood Parties
- 2 • Ross Arthur Brewer
- 3 • H3M Property Holdings, LP
- 4 • Vested Rock Ventures, Ltd.
- 5 • Shale Creek Homeowners Association Inc.
- 6 • Charles Dee and Gretchen Brown
- 7 • Justin Butler
- 8 • Shelley Butler
- 9 • Raymond Loustaunau
- 10 • Joshua Chute
- 11 • James and Holly Lewis
- 12 • Craig D.K. and Alice M. Jones
- 13 • Tracy Millis
- 14 • Harvey and Cynthia Reeves
- 15 • Justin Town Center, Ltd.
- 16 • JTS 3.8, LLC
- 17 • Greg and Mallory Maberry
- 18 • Wayne and Norma Wilkerson
- 19 • Wyatt Matthews
- 20 • Brenna Matthews
- 21 • James and Pamela Matthews
- 22 • Russell Sherwood
- 23 • Harold Woolsey and Lisa Lyngos
- 24 • Ronald and Katie Morehead

- 1 • GRBK Edgewood LLC and GBTM Sendera LLC
- 2 • Todd Templeton
- 3 • Jeffery Scott Brooks
- 4 • Karen Templeton
- 5 • Alan Yarbrough
- 6 • Sara Yarbrough
- 7 • John Roddam
- 8 • Craig C. LaPlant
- 9 • Zac and Kim Harbert
- 10 • Timothy Simmons
- 11 • Ana Simmons
- 12 • Crystal Boyd
- 13 • Daniel Dennis
- 14 • Melissa Dennis

15 **Q. Did the above referenced intervenors take positions on Routes 179-Watkins and 179R**
 16 **after their review of your testimony and/or receipt of Requests for Information?**

17 A. Yes.

18 **Q. What are those positions?**

19 A. The following parties now express either support for or non-opposition to Route 179-
 20 Watkins and Route 179R:

- 21 • Furst Ranch Intervenors (support)⁶
- 22 • Dennis Tolleson (not oppose)⁷

⁶ Furst Ranch Intervenors RFI responses (Item No. 1587).

⁷ Dennis Tolleson RFI responses (Item No. 1575).

- 1 • Joanna and Jeremy Girard (support or not oppose)⁸
- 2 • Matthew Spaethe (support or not oppose)⁹
- 3 • GFAT, LLC (support or not oppose)¹⁰
- 4 • Margaret Chavez (support or not oppose)¹¹
- 5 • David Bratton (support or not oppose)¹²
- 6 • Jerry Bratton (support or not oppose)¹³
- 7 • Bill Beverly (support or not oppose)¹⁴
- 8 • Janet Beverly (support or not oppose)¹⁵
- 9 • Keith Norris (support or not oppose)¹⁶
- 10 • Martin Rojas (support or not oppose)¹⁷
- 11 • Michael Hamilton (support or not oppose)¹⁸
- 12 • Rama Prasad Chalasani (support or not oppose)¹⁹
- 13 • DHL Supply Chain (not oppose)²⁰
- 14 • J L Logan Properties (not oppose)²¹

⁸ Joanna and Jeremy Girard RFI responses (Item No. 1612).

⁹ Matthew Spaethe RFI responses (Item No. 1599).

¹⁰ GFAT, LLC RFI responses (Item No. 1602).

¹¹ Margaret Chavez RFI responses (Item No. 1603).

¹² David Bratton RFI responses (Item No. 1601).

¹³ Jerry Bratton RFI responses (Item No. 1600).

¹⁴ Bill Beverly RFI responses (Item No. 1597).

¹⁵ Janet Beverly RFI responses (Item No. 1593).

¹⁶ Keith Norris RFI responses (Item No. 1592).

¹⁷ Martin Rojas RFI responses (Item No. 1598).

¹⁸ Michael Hamilton RFI responses (Item No. 1594).

¹⁹ Rama Prasad Chalasani RFI responses (Item No. 1595).

²⁰ DHL Supply Chain RFI responses (Item No. 1576).

²¹ J L Logan Properties RFI responses (Item No. 1619).

- 1 • Town of Northlake (support or not oppose)²²
- 2 • Deborah M. Atchley, Trustee (not oppose)²³
- 3 • Bud and Mickey Logan Properties (not oppose)²⁴
- 4 • Floyd T. McCurdy Testamentary Trust (support or not oppose)²⁵
- 5 • Peggy Logan McCurdy (support or not oppose)²⁶
- 6 • New Dimension Investments II, LLC (not oppose)²⁷
- 7 • Henry Northlake Development, LLC (not oppose)²⁸
- 8 • Shawn Wells (not oppose)²⁹
- 9 • Hillwood Parties (not opposed for settlement purposes)³⁰
- 10 • Ross Arthur Brewer (not oppose)³¹
- 11 • H3M Property Holdings, LP (not oppose)³²
- 12 • Charles Dee and Gretchen Brown (not oppose)³³
- 13 • Justin Butler (support or not oppose)³⁴

²² Town of Northlake RFI responses (Item No. 1565). The Town of Northlake supports or doesn't oppose Route 179-Watkins and Route 179R, provided the caveats and route adjustments requested in Northlake's testimony are followed or resolved. These caveats and route adjustments pertain to segments shared by Route 179, Route 179-Watkins and Route 179R.

²³ Deborah M. Atchley, Trustee RFI responses (Item No. 1618).

²⁴ Bud and Mickey Logan Properties RFI responses (Item No. 1617).

²⁵ Floyd T. McCurdy Testamentary Trust RFI responses (Item No. 1604).

²⁶ Peggy Logan McCurdy RFI responses (Item No. 1605).

²⁷ New Dimension Investments II, LLC RFI responses (Item No. 1616).

²⁸ Henry Northlake Development, LLC RFI responses (Item No. 1608).

²⁹ Shawn Wells RFI responses (Item No. 1614).

³⁰ Hillwood Parties RFI responses (Item No. 1588). Hillwood Parties' responses state that, "...if Oncor and the other parties were to accept Route 179R [or Route 179-Watkins] as the uncontested agreed settlement route, Hillwood Parties would not oppose the agreed settlement route."

³¹ Ross Arthur Brewer RFI responses (Item No. 1529).

³² H3M Property Holdings, LP RFI responses (Item No. 1530).

³³ Charles Dee and Gretchen Brown RFI responses (Item No. 1574).

³⁴ Justin Butler RFI responses (Item No. 1644).

- 1 • Shelly Butler (support or not oppose)³⁵
- 2 • Joshua Chute (not oppose)³⁶
- 3 • Craig D.K. and Alice M. Jones (not oppose)³⁷
- 4 • Tracy Millis (not oppose)³⁸
- 5 • Wayne and Norma Wilkerson (not oppose)³⁹
- 6 • Russell Sherwood (support)⁴⁰
- 7 • Harold Woolsey and Lisa Lyngos (not oppose)⁴¹
- 8 • Ronald and Katie Morehead (not oppose)⁴²
- 9 • John Roddam (not oppose)⁴³
- 10 • Craig C. LaPlant (not oppose)⁴⁴
- 11 • Crystal Boyd (support or not oppose)⁴⁵
- 12 • Jeffrey Scott Brooks (support)⁴⁶
- 13 • Harvey and Cynthia Reeves (not oppose)⁴⁷
- 14 • Raymond Lousaunau (not oppose)⁴⁸

³⁵ Shelly Butler RFI responses (Item No. 1632).

³⁶ Joshua Chute RFI responses (Item No. 1583).

³⁷ Craig D.K. and Alice M. Jones RFI responses (Item No. 1624).

³⁸ Tracy Millis RFI responses (Item No. 1613).

³⁹ Wayne and Norma Wilkerson RFI responses (Item No. 1578).

⁴⁰ Russell Sherwood RFI responses (Item No. 1573).

⁴¹ Harold Woolsey and Lisa Lyngos RFI responses (Item No. 1586).

⁴² Ronald and Katie Morehead RFI responses (Item No. 1610).

⁴³ John Roddam RFI responses (Item No. 1622).

⁴⁴ Craig C. LaPlant RFI responses (Item No. 1581).

⁴⁵ Crystal Boyd RFI responses (Item No. 1623).

⁴⁶ Jeffrey Scott Brooks RFI responses (Item No. 1635).

⁴⁷ Harvey and Cynthia Reeves RFI responses (Item No. 1638).

⁴⁸ Raymond Lousaunau RFI responses (Item No. 1642).

1 The following party now expresses support for Route 179-Watkins (no comment on Route
2 179R):

- 3 • GRBK Edgewood LLC and GBTM Sendera LLC (support)⁴⁹

4 The following parties now express non-opposition to Route 179R (no comment on Route
5 179-Watkins):

- 6 • James and Pamela Matthews (not oppose)⁵⁰
- 7 • Wyatt Matthews (not oppose)⁵¹
- 8 • Brenna Matthews (not oppose)⁵²

9 The following parties now expresses opposition to Route 179-Watkins and Route 179R:

- 10 • James and Holly Lewis (opposes both routes based on their use of Segment J3
11 which is also used in Route 179—so their opposition is not specific to my proposed
12 modifications to Route 179 (i.e., the 179-Watkins and 179R modifications) and it
13 is reasonable to believe this party is also opposed to Oncor’s Route 179)⁵³
- 14 • Justin Town Center, Ltd. (oppose both routes based on their use of Segments C7
15 and E2 which are also used in Route 179— so their opposition is not specific to my
16 proposed modifications to Route 179 (i.e., the 179-Watkins and 179R
17 modifications) and it is reasonable to believe this party is also opposed to Oncor’s
18 Route 179)⁵⁴

⁴⁹ GRBK Edgewood LLC and GBTM Sendera LLC RFI responses (Item No. 1585).

⁵⁰ James and Pamela Matthews RFI responses (Item No. 1639).

⁵¹ Wyatt Matthews RFI responses (Item No. 1640).

⁵² Brenna Matthews RFI responses (Item No. 1641).

⁵³ James and Holly Lewis RFI responses (Item No. 1577).

⁵⁴ Justin Town Center, Ltd. RFI responses (Item No. 1626).

- 1 • JTS 3.8, LLC (oppose both routes based on their use of Segments C7 and E2 which
2 are also used in Route 179—so their opposition is not specific to my proposed
3 modifications to Route 179 (i.e., the 179-Watkins and 179R modifications) and it
4 is reasonable to believe this party is also opposed to Oncor’s Route 179)⁵⁵
- 5 • Greg and Mallory Maberry (oppose both routes based on their use of Segments K1,
6 L5 and L4 which are also used in Route 179—so their opposition is not specific to
7 my proposed modifications to Route 179 (i.e., the 179-Watkins and 179R
8 modifications) and it is reasonable to believe this party is also opposed to Oncor’s
9 Route 179)⁵⁶
- 10 • Sara Yarbrough (oppose both routes based on their use of Segments H8, I8 and J3
11 which are also used in Route 179—so her opposition is not specific to my proposed
12 modifications to Route 179 (i.e., the 179-Watkins and 179R modifications) and it
13 is reasonable to believe this party is also opposed to Oncor’s Route 179)⁵⁷
- 14 • Alan Yarbrough (oppose both routes based on their use of Segments H8, I8 and J3
15 which are also used in Route 179—so his opposition is not specific to my proposed
16 modifications to Route 179 (i.e., the 179-Watkins and 179R modifications) and it
17 is reasonable to believe this party is also opposed to Oncor’s Route 179)⁵⁸
- 18 • Timothy Simmons (opposes both routes based on their use of Segment J3 which is
19 also used in Route 179—so his opposition is not specific to my proposed
20 modifications to Route 179 (i.e., the 179-Watkins and 179R modifications) and it
21 is reasonable to believe this party is also opposed to Oncor’s Route 179)

⁵⁵ JTS 3.8, LLC RFI responses (Item No. 1627).

⁵⁶ Greg and Mallory Maberry RFI responses (Item No. 1625).

⁵⁷ Sara Yarbrough RFI responses (Item No. 1630).

⁵⁸ Alan Yarbrough RFI responses (Item No. 1637).

(specifically stated that he does not have disagreement with the proposed modified segments by T. Brian Almon)⁵⁹

- Ana Simmons (opposes both routes based on their use of Segment J3 which is also used in Route 179—so her opposition is not specific to my proposed modifications to Route 179 (i.e., the 179-Watkins and 179R modifications) and it is reasonable to believe this party is also opposed to Oncor’s Route 179) (specifically stated that she does not have disagreement with the proposed modified segments by T. Brian Almon)⁶⁰

- Daniel Dennis (oppose both routes based on their use of Segments H8, I8 and J3 which are also used in Route 179—so his opposition is not specific to my proposed modifications to Route 179 (i.e., the 179-Watkins and 179R modifications) and it is reasonable to believe this party is also opposed to Oncor’s Route 179)⁶¹

- Melissa Dennis (oppose both routes based on their use of Segments H8, I8 and J3 which are also used in Route 179—so her opposition is not specific to my proposed modifications to Route 179 (i.e., the 179-Watkins and 179R modifications) and it is reasonable to believe this party is also opposed to Oncor’s Route 179)⁶²

- Vested Rock Ventures, Ltd.⁶³

The following parties have yet to respond to outstanding Requests for Information as of the time this testimony was filed:

- Shale Creek Homeowners Association Inc.

⁵⁹ Timothy Simmons RFI responses (Item No. 1628).

⁶⁰ Ana Simmons RFI responses (Item No. 1629).

⁶¹ Daniel Dennis RFI responses (Item No. 1607).

⁶² Melissa Dennis RFI responses (Item No. 1615).

⁶³ Vested Rock Ventures, Ltd. RFI responses (Item No. 1636).

- Todd Templeton
- Karen Templeton
- Zac and Kim Harbert

Q. Have any local municipalities indicated their routing preferences in this docket or otherwise?

A. Yes. The Cities of Justin, New Fairview and Rhome passed a Joint Resolution “seeking construction of the transmission line along a regionally preferred route.”⁶⁴ The Joint Resolution recites that the cities “are governmental entities engaged in the protection and preservation of their community and its citizenry,” and includes an exhibit depicting a “less-disruptive route...to construct the transmission line provid[ing] the best possible route scenario for our region.”⁶⁵ A complete copy of the Joint Resolution (including Exhibit A to the resolution) is attached to my testimony as Exhibit “B”.⁶⁶

Q. Do any of the regionally preferred routing options proposed by the Cities of Justin, New Fairview and Rhome utilize Segment V2?

A. No.⁶⁷ The regionally preferred routing options use Segments V1, V3 and V4 just like my Route 179R and just like my recommendation that the combination of links V1, V3, and V4 should be used in place of link V2 in *any* route selected by the Judges and Commission.

Q. Do you believe these cities’ regional concerns are an important reflection of community values and should be taken into account?

A. Yes.

⁶⁴ Joint Resolution, Page 1 (Item No. 1611).

⁶⁵ Joint Resolution, Pages 1-2 (Item No. 1611).

⁶⁶ An *incomplete* copy of this resolution was filed by the City of New Fairview as Item No. 1105 in this docket. A *complete* copy was provided by the City of Rhome as part of the City of Rhome’s response to RFI’s (Item No. 1611).

⁶⁷ See Exhibit “A” to Joint Resolution (Item No. 1611).

EXHIBIT “A”

RFI RESPONSES



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**SOAH Docket No. 473-23-21216
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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	§ § § § § § §	BEFORE THE STATE OFFICE OF ADMINISTRATIVE HEARINGS
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**FURST RANCH RESPONSES TO EDGAR BRENT WATKINS AND MARY ANN
LIVENGOOD’S FIRST SET OF REQUESTS FOR INFORMATION**

Old WR Ranch I, L.P. (“Old WR”), 64.3 SE 1171/377 LLC (“64.3”), and SWC 1171-377, Ltd (“SWC”), collectively referred to as “Furst Ranch Intervenor”, file this its responses to the First Request for Information from Edgar Brent Watkins and Mary Ann Livengood. These responses are timely filed and Furst Ranch agrees and stipulates that all parties may treat these responses as if the answer were filed under oath.

SIGNED this 9th day of August, 2023.

By: /s/ Robert S. Furst
Robert S. Furst
Vice President of Old WR Ranch, LLC, the general partner of Old WR Ranch I, LP.
2591 Lakeside Parkway, Suite 100
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rob@oakstreaminvestors.com

By: /s/ Robert S. Furst
Robert S. Furst
Vice President of JaJo LLC, the general partner of SWC 1171-377, Ltd.
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214-704-7408
rob@oakstreaminvestors.com

By: /s/ Jack Furst
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**SOAH Docket No. 473-23-21216
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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	§ § § § § § §	BEFORE THE STATE OFFICE OF ADMINISTRATIVE HEARINGS
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**FURST RANCH OBJECTIONS AND RESPONSES TO EDGAR BRENT WATKINS AND
MARY ANN LIVENGOOD’S FIRST SET OF REQUESTS FOR INFORMATION**

Watkins RFI No. 1-1. Please confirm that your properties are 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. Support.
- b. Not applicable.

Watkins RFI No. 1-3. Please confirm that your properties are 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 M2-M3-R4-V2?
- b. If you cannot agree to support or “not oppose” Route 179-Watkins, please explain why.

Response:

- a. Support.
- b. Not applicable.



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Control Number - 55067

Item Number - 1575

DENNIS TOLLESON 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, DENNIS TOLLESON 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 REQUEST FOR INFORMATION TO DENNIS TOLLESON

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.



Filing Receipt

Filing Date - 2023-08-09 05:31:14 PM

Control Number - 55067

Item Number - 1612

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

**EDGAR BRENT WATKINS AND MARY ANN LIVENGOOD'S FIRST SET OF
REQUESTS FOR INFORMATION TO JOANNA AND JEREMY GIRARD**

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

Response: confirmed

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: Yes

No. 1-3. Please confirm that your property is not directly impacted by any of Segments M5-R2-R5-U3-V3-V4.

Response: Confirmed

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: Yes



Filing Receipt

Filing Date - 2023-08-09 12:09:28 PM

Control Number - 55067

Item Number - 1599

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

APPLICATION OF ONCOR ELECTRIC	§	BEFORE THE STATE OFFICE
DELIVERY LLC TO AMEND ITS	§	
CERTIFICATE OF CONVENIENCE	§	
AND NECESSITY FOR THE RAMHORN	§	OF
HILL – DUNHAM 345-KV	§	
TRANSMISSION LINE IN DENTON	§	
AND WISE COUNTIES	§	ADMINISTRATIVE HEARINGS

**MATTHEW SPAETHE’S 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 Steward, 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, Matthew Spaethe hereby serves their Responses to Edgar Brent Watkins and Mary Ann Livengood’s First Set of Requests for Information. The responses to these questions may be treated as through provided under oath.

Respectfully submitted,

BRAUN & GRESHAM, PLLC
P.O. Box 1148 (Mailing)
Dripping Springs, Texas 78620
512-894-5426 (telephone)
512-894-3405 (fax)

/s/Patrick L. Reznik
Patrick L. Reznik
State Bar No. 16806780
preznik@braungresham.com
Carly Barton
State Bar No. 24086063
cbarton@braungresham.com

ATTORNEYS FOR MATTHEW SPAETHE

CERTIFICATE OF SERVICE

I certify that a true and correct copy of the foregoing document was served on all parties and counsel of record on August 9, 2023, in accordance with PUC Procedural Rule 22.74 and Orders issued in Docket No. 55067 to date.

/s/Patrick L. Reznik

Patrick L. Reznik

**MATTHEW SPAETHE'S RESPONSE TO EDGAR BRENT WATKINS AND MARY
ANN LIVENGOOD'S FIRST SET OF REQUESTS FOR INFORMATION**

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

RESPONSE: Confirmed.

Prepared by: Patrick L. Reznik
Sponsored by: Matthew Spaethe

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: Yes.

Prepared by: Patrick L. Reznik
Sponsored by: Matthew Spaethe

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.

Prepared by: Patrick L. Reznik
Sponsored by: Matthew Spaethe

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: Yes.

Prepared by: Patrick L. Reznik
Sponsored by: Matthew Spaethe



Filing Receipt

Filing Date - 2023-08-09 12:42:48 PM

Control Number - 55067

Item Number - 1602

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

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	§ § § § § § §	BEFORE THE STATE OFFICE OF ADMINISTRATIVE HEARINGS
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**GFAT, LLC’S 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 Steward, 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, GFAT, LLC hereby serves their Responses to Edgar Brent Watkins and Mary Ann Livengood’s First Set of Requests for Information. The responses to these questions may be treated as through provided under oath.

Respectfully submitted,

BRAUN & GRESHAM, PLLC
P.O. Box 1148 (Mailing)
Dripping Springs, Texas 78620
512-894-5426 (telephone)
512-894-3405 (fax)

/s/Patrick L. Reznik
Patrick L. Reznik
State Bar No. 16806780
preznik@braungresham.com
Carly Barton
State Bar No. 24086063
cbarton@braungresham.com

ATTORNEYS FOR GFAT, LLC

CERTIFICATE OF SERVICE

I certify that a true and correct copy of the foregoing document was served on all parties and counsel of record on August 9, 2023, in accordance with PUC Procedural Rule 22.74 and Orders issued in Docket No. 55067 to date.

/s/Patrick L. Reznik

Patrick L. Reznik

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

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

RESPONSE: Confirmed.

Prepared by: Patrick L. Reznik
Sponsored by: GFAT, LLC

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: Yes.

Prepared by: Patrick L. Reznik
Sponsored by: GFAT, LLC

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.

Prepared by: Patrick L. Reznik
Sponsored by: GFAT, LLC

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: Yes.

Prepared by: Patrick L. Reznik
Sponsored by: GFAT, LLC



Filing Receipt

Filing Date - 2023-08-09 12:44:03 PM

Control Number - 55067

Item Number - 1603

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

APPLICATION OF ONCOR ELECTRIC	§	BEFORE THE STATE OFFICE
DELIVERY LLC TO AMEND ITS	§	
CERTIFICATE OF CONVENIENCE	§	
AND NECESSITY FOR THE RAMHORN	§	OF
HILL – DUNHAM 345-KV	§	
TRANSMISSION LINE IN DENTON	§	
AND WISE COUNTIES	§	ADMINISTRATIVE HEARINGS

**MARGARET CHAVEZ’S 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 Steward, 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, Margret Chavez hereby serves their Responses to Edgar Brent Watkins and Mary Ann Livengood’s First Set of Requests for Information. The responses to these questions may be treated as through provided under oath.

Respectfully submitted,

BRAUN & GRESHAM, PLLC
P.O. Box 1148 (Mailing)
Dripping Springs, Texas 78620
512-894-5426 (telephone)
512-894-3405 (fax)

/s/Patrick L. Reznik
Patrick L. Reznik
State Bar No. 16806780
preznik@braungresham.com
Carly Barton
State Bar No. 24086063
cbarton@braungresham.com

ATTORNEYS FOR MARGARET CHAVEZ

CERTIFICATE OF SERVICE

I certify that a true and correct copy of the foregoing document was served on all parties and counsel of record on August 9, 2023, in accordance with PUC Procedural Rule 22.74 and Orders issued in Docket No. 55067 to date.

/s/Patrick L. Reznik

Patrick L. Reznik

**MARGARET CHAVEZ'S RESPONSE TO EDGAR BRENT WATKINS AND MARY
ANN LIVENGOOD'S FIRST SET OF REQUESTS FOR INFORMATION**

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

RESPONSE: Confirmed.

Prepared by: Patrick L. Reznik
Sponsored by: Margaret Chavez

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: Yes.

Prepared by: Patrick L. Reznik
Sponsored by: Margaret Chavez

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.

Prepared by: Patrick L. Reznik
Sponsored by: Margaret Chavez

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: Yes.

Prepared by: Patrick L. Reznik
Sponsored by: Margaret Chavez



Filing Receipt

Filing Date - 2023-08-09 12:27:47 PM

Control Number - 55067

Item Number - 1601

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

APPLICATION OF ONCOR ELECTRIC	§	BEFORE THE STATE OFFICE
DELIVERY LLC TO AMEND ITS	§	
CERTIFICATE OF CONVENIENCE	§	
AND NECESSITY FOR THE RAMHORN	§	OF
HILL – DUNHAM 345-KV	§	
TRANSMISSION LINE IN DENTON	§	
AND WISE COUNTIES	§	ADMINISTRATIVE HEARINGS

**DAVID BRATTON’S 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 Steward, 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, David Bratton hereby serves their Responses to Edgar Brent Watkins and Mary Ann Livengood’s First Set of Requests for Information. The responses to these questions may be treated as through provided under oath.

Respectfully submitted,

BRAUN & GRESHAM, PLLC
P.O. Box 1148 (Mailing)
Dripping Springs, Texas 78620
512-894-5426 (telephone)
512-894-3405 (fax)

/s/Patrick L. Reznik
Patrick L. Reznik
State Bar No. 16806780
preznik@braungresham.com
Carly Barton
State Bar No. 24086063
cbarton@braungresham.com

ATTORNEYS FOR DAVID BRATTON

CERTIFICATE OF SERVICE

I certify that a true and correct copy of the foregoing document was served on all parties and counsel of record on August 9, 2023, in accordance with PUC Procedural Rule 22.74 and Orders issued in Docket No. 55067 to date.

/s/Patrick L. Reznik

Patrick L. Reznik

**DAVID BRATTON'S RESPONSE TO EDGAR BRENT WATKINS AND MARY ANN
LIVENGOOD'S FIRST SET OF REQUESTS FOR INFORMATION**

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

RESPONSE: Confirmed.

Prepared by: Patrick L. Reznik
Sponsored by: David Bratton

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: Yes.

Prepared by: Patrick L. Reznik
Sponsored by: David Bratton

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.

Prepared by: Patrick L. Reznik
Sponsored by: David Bratton

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: Yes.

Prepared by: Patrick L. Reznik
Sponsored by: David Bratton



Filing Receipt

Filing Date - 2023-08-09 12:27:06 PM

Control Number - 55067

Item Number - 1600

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

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	§ § § § § § §	BEFORE THE STATE OFFICE OF ADMINISTRATIVE HEARINGS
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**JERRY BRATTON'S 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 Steward, 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, Jerry Bratton hereby serves their Responses to Edgar Brent Watkins and Mary Ann Livengood's First Set of Requests for Information. The responses to these questions may be treated as through provided under oath.

Respectfully submitted,

BRAUN & GRESHAM, PLLC
P.O. Box 1148 (Mailing)
Dripping Springs, Texas 78620
512-894-5426 (telephone)
512-894-3405 (fax)

/s/Patrick L. Reznik
Patrick L. Reznik
State Bar No. 16806780
preznik@braungresham.com
Carly Barton
State Bar No. 24086063
cbarton@braungresham.com

ATTORNEYS FOR JERRY BRATTON

CERTIFICATE OF SERVICE

I certify that a true and correct copy of the foregoing document was served on all parties and counsel of record on August 9, 2023, in accordance with PUC Procedural Rule 22.74 and Orders issued in Docket No. 55067 to date.

/s/Patrick L. Reznik

Patrick L. Reznik

**JERRY BRATTON'S RESPONSE TO EDGAR BRENT WATKINS AND MARY ANN
LIVENGOOD'S FIRST SET OF REQUESTS FOR INFORMATION**

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

RESPONSE: Confirmed.

Prepared by: Patrick L. Reznik
Sponsored by: Jerry Bratton

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: Yes.

Prepared by: Patrick L. Reznik
Sponsored by: Jerry Bratton

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.

Prepared by: Patrick L. Reznik
Sponsored by: Jerry Bratton

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: Yes.

Prepared by: Patrick L. Reznik
Sponsored by: Jerry Bratton



Filing Receipt

Filing Date - 2023-08-09 12:07:35 PM

Control Number - 55067

Item Number - 1597

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

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	§ § § § § § §	BEFORE THE STATE OFFICE OF ADMINISTRATIVE HEARINGS
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**BILL BEVERLY’S 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 Steward, 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, Bill Beverly hereby serves their Responses to Edgar Brent Watkins and Mary Ann Livengood’s First Set of Requests for Information. The responses to these questions may be treated as through provided under oath.

Respectfully submitted,

BRAUN & GRESHAM, PLLC
P.O. Box 1148 (Mailing)
Dripping Springs, Texas 78620
512-894-5426 (telephone)
512-894-3405 (fax)

/s/Patrick L. Reznik
Patrick L. Reznik
State Bar No. 16806780
preznik@braungresham.com
Carly Barton
State Bar No. 24086063
cbarton@braungresham.com

ATTORNEYS FOR BILL BEVERLY

CERTIFICATE OF SERVICE

I certify that a true and correct copy of the foregoing document was served on all parties and counsel of record on August 9, 2023, in accordance with PUC Procedural Rule 22.74 and Orders issued in Docket No. 55067 to date.

/s/Patrick L. Reznik

Patrick L. Reznik

**BILL BEVERLY'S RESPONSE TO EDGAR BRENT WATKINS AND MARY ANN
LIVENGOOD'S FIRST SET OF REQUESTS FOR INFORMATION**

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

RESPONSE: Confirmed.

Prepared by: Patrick L. Reznik
Sponsored by: Bill Beverly

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: Yes.

Prepared by: Patrick L. Reznik
Sponsored by: Bill Beverly

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.

Prepared by: Patrick L. Reznik
Sponsored by: Bill Beverly

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: Yes.

Prepared by: Patrick L. Reznik
Sponsored by: Bill Beverly



Filing Receipt

Filing Date - 2023-08-09 12:03:13 PM

Control Number - 55067

Item Number - 1593

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

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	§ § § § § § §	BEFORE THE STATE OFFICE OF ADMINISTRATIVE HEARINGS
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**JANET BEVERLY’S 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 Steward, 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, Janet Beverly hereby serves their Responses to Edgar Brent Watkins and Mary Ann Livengood’s First Set of Requests for Information. The responses to these questions may be treated as through provided under oath.

Respectfully submitted,

BRAUN & GRESHAM, PLLC
P.O. Box 1148 (Mailing)
Dripping Springs, Texas 78620
512-894-5426 (telephone)
512-894-3405 (fax)

/s/Patrick L. Reznik
Patrick L. Reznik
State Bar No. 16806780
preznik@braungresham.com
Carly Barton
State Bar No. 24086063
cbarton@braungresham.com

ATTORNEYS FOR JANET BEVERLY

CERTIFICATE OF SERVICE

I certify that a true and correct copy of the foregoing document was served on all parties and counsel of record on August 9, 2023, in accordance with PUC Procedural Rule 22.74 and Orders issued in Docket No. 55067 to date.

/s/Patrick L. Reznik

Patrick L. Reznik

**JANET BEVERLY'S RESPONSE TO EDGAR BRENT WATKINS AND MARY ANN
LIVENGOOD'S FIRST SET OF REQUESTS FOR INFORMATION**

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

RESPONSE: Confirmed.

Prepared by: Patrick L. Reznik
Sponsored by: Janet Beverly

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: Yes.

Prepared by: Patrick L. Reznik
Sponsored by: Janet Beverly

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.

Prepared by: Patrick L. Reznik
Sponsored by: Janet Beverly

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: Yes.

Prepared by: Patrick L. Reznik
Sponsored by: Janet Beverly



Filing Receipt

Filing Date - 2023-08-09 12:01:58 PM

Control Number - 55067

Item Number - 1592

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

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	§ § § § § § §	BEFORE THE STATE OFFICE OF ADMINISTRATIVE HEARINGS
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**KEITH NORRIS'S 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 Steward, 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, Keith Norris hereby serves their Responses to Edgar Brent Watkins and Mary Ann Livengood's First Set of Requests for Information. The responses to these questions may be treated as through provided under oath.

Respectfully submitted,

BRAUN & GRESHAM, PLLC
P.O. Box 1148 (Mailing)
Dripping Springs, Texas 78620
512-894-5426 (telephone)
512-894-3405 (fax)

/s/Patrick L. Reznik
Patrick L. Reznik
State Bar No. 16806780
preznik@braungresham.com
Carly Barton
State Bar No. 24086063
cbarton@braungresham.com

ATTORNEYS FOR KEITH NORRIS

CERTIFICATE OF SERVICE

I certify that a true and correct copy of the foregoing document was served on all parties and counsel of record on August 9, 2023, in accordance with PUC Procedural Rule 22.74 and Orders issued in Docket No. 55067 to date.

/s/Patrick L. Reznik

Patrick L. Reznik

**KEITH NORRIS'S RESPONSE TO EDGAR BRENT WATKINS AND MARY ANN
LIVENGOOD'S FIRST SET OF REQUESTS FOR INFORMATION**

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

RESPONSE: Confirmed.

Prepared by: Patrick L. Reznik
Sponsored by: Keith Norris

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: Yes.

Prepared by: Patrick L. Reznik
Sponsored by: Keith Norris

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.

Prepared by: Patrick L. Reznik
Sponsored by: Keith Norris

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: Yes.

Prepared by: Patrick L. Reznik
Sponsored by: Keith Norris



Filing Receipt

Filing Date - 2023-08-09 12:08:13 PM

Control Number - 55067

Item Number - 1598

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

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	§ § § § § § §	BEFORE THE STATE OFFICE OF ADMINISTRATIVE HEARINGS
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**MARTIN ROJAS'S 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 Steward, 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, Martin Rojas hereby serves their Responses to Edgar Brent Watkins and Mary Ann Livengood's First Set of Requests for Information. The responses to these questions may be treated as through provided under oath.

Respectfully submitted,

BRAUN & GRESHAM, PLLC
P.O. Box 1148 (Mailing)
Dripping Springs, Texas 78620
512-894-5426 (telephone)
512-894-3405 (fax)

/s/Patrick L. Reznik
Patrick L. Reznik
State Bar No. 16806780
preznik@braungresham.com
Carly Barton
State Bar No. 24086063
cbarton@braungresham.com

ATTORNEYS FOR MARTIN ROJAS

CERTIFICATE OF SERVICE

I certify that a true and correct copy of the foregoing document was served on all parties and counsel of record on August 9, 2023, in accordance with PUC Procedural Rule 22.74 and Orders issued in Docket No. 55067 to date.

/s/Patrick L. Reznik

Patrick L. Reznik

**MARTIN ROJAS'S RESPONSE TO EDGAR BRENT WATKINS AND MARY ANN
LIVENGOOD'S FIRST SET OF REQUESTS FOR INFORMATION**

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

RESPONSE: Confirmed.

Prepared by: Patrick L. Reznik
Sponsored by: Martin Rojas

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: Yes.

Prepared by: Patrick L. Reznik
Sponsored by: Martin Rojas

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.

Prepared by: Patrick L. Reznik
Sponsored by: Martin Rojas

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: Yes.

Prepared by: Patrick L. Reznik
Sponsored by: Martin Rojas



Filing Receipt

Filing Date - 2023-08-09 12:04:28 PM

Control Number - 55067

Item Number - 1594

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

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	§ § § § § § §	BEFORE THE STATE OFFICE OF ADMINISTRATIVE HEARINGS
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**MICHAEL HAMILTON’S 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 Steward, 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, Michael Hamilton hereby serves their Responses to Edgar Brent Watkins and Mary Ann Livengood’s First Set of Requests for Information. The responses to these questions may be treated as through provided under oath.

Respectfully submitted,

BRAUN & GRESHAM, PLLC
P.O. Box 1148 (Mailing)
Dripping Springs, Texas 78620
512-894-5426 (telephone)
512-894-3405 (fax)

/s/Patrick L. Reznik
Patrick L. Reznik
State Bar No. 16806780
preznik@braungresham.com
Carly Barton
State Bar No. 24086063
cbarton@braungresham.com

ATTORNEYS FOR MICHAEL HAMILTON

CERTIFICATE OF SERVICE

I certify that a true and correct copy of the foregoing document was served on all parties and counsel of record on August 9, 2023, in accordance with PUC Procedural Rule 22.74 and Orders issued in Docket No. 55067 to date.

/s/Patrick L. Reznik

Patrick L. Reznik

**MICHAEL HAMILTON'S RESPONSE TO EDGAR BRENT WATKINS AND MARY
ANN LIVENGOOD'S FIRST SET OF REQUESTS FOR INFORMATION**

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

RESPONSE: Confirmed.

Prepared by: Patrick L. Reznik
Sponsored by: Michael Hamilton

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: Yes.

Prepared by: Patrick L. Reznik
Sponsored by: Michael Hamilton

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.

Prepared by: Patrick L. Reznik
Sponsored by: Michael Hamilton

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: Yes.

Prepared by: Patrick L. Reznik
Sponsored by: Michael Hamilton



Filing Receipt

Filing Date - 2023-08-09 12:05:06 PM

Control Number - 55067

Item Number - 1595

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

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	§ § § § § § §	BEFORE THE STATE OFFICE OF ADMINISTRATIVE HEARINGS
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**RAMA PRASAD CHALASANI'S 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 Steward, 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, Rama Prasad Chalasani hereby serves their Responses to Edgar Brent Watkins and Mary Ann Livengood's First Set of Requests for Information. The responses to these questions may be treated as through provided under oath.

Respectfully submitted,

BRAUN & GRESHAM, PLLC
P.O. Box 1148 (Mailing)
Dripping Springs, Texas 78620
512-894-5426 (telephone)
512-894-3405 (fax)

/s/Patrick L. Reznik
Patrick L. Reznik
State Bar No. 16806780
preznik@braungresham.com
Carly Barton
State Bar No. 24086063
cbarton@braungresham.com

**ATTORNEYS FOR RAMA PRASAD
CHALASANI**

CERTIFICATE OF SERVICE

I certify that a true and correct copy of the foregoing document was served on all parties and counsel of record on August 9, 2023, in accordance with PUC Procedural Rule 22.74 and Orders issued in Docket No. 55067 to date.

/s/Patrick L. Reznik

Patrick L. Reznik

**RAMA PRASAD CHALASANI'S RESPONSE TO EDGAR BRENT WATKINS AND
MARY ANN LIVENGOOD'S FIRST SET OF REQUESTS FOR INFORMATION**

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

RESPONSE: Confirmed.

Prepared by: Patrick L. Reznik
Sponsored by: Rama Prasad Chalasani

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: Yes.

Prepared by: Patrick L. Reznik
Sponsored by: Rama Prasad Chalasani

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.

Prepared by: Patrick L. Reznik
Sponsored by: Rama Prasad Chalasani

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: Yes.

Prepared by: Patrick L. Reznik

Sponsored by: Rama Prasad Chalasani



Filing Receipt

Filing Date - 2023-08-06 09:24:12 PM

Control Number - 55067

Item Number - 1576

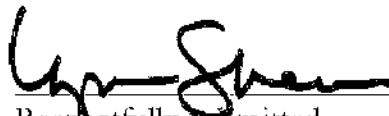
**SOAH DOCKET NO. 473-23-21216
PUC DOCKET NO. 55067**

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	§ § § § § § §	BEFORE THE PUBLIC UTILITY COMMISSION OF TEXAS
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**DHL SUPPLY CHAIN'S RESPONSE TO EDGAR BRENT WATKINS AND
MARY ANN LIVENGOOD'S FIRST SET OF REQUESTS FOR INFORMATION**

NOW COMES, Fixel Inc., d/b/a DHL Supply Chain (USA) (hereinafter "DHL Supply Chain" or "DHL") and files this Response to Edgar Brent Watkins and Mary Ann Livengood's First Set of Requests for Information in the above-referenced proceeding.

DHL Supply Chain's written responses to Edgar Brent Watkins and Mary Ann Livengood's First Set of Requests for Information (hereinafter "First RFIs") are attached and incorporated by reference. Each response is stated on or attached to a separate page on which the request has been restated. DHL Supply Chain's responses are made in the spirit of cooperation without waiving DHL Supply Chain's right to contest the admissibility of any of these matters at hearing, without waiving any previously filed objections, and subject to DHL Supply Chain's continuing right and obligation to supplement its responses if it determines the response(s) was/were incorrect or incomplete when made or, though correct or complete when made, is/are materially incorrect or incomplete. Pursuant to 16 Texas Administrative Code ("TAC") § 22.144(c)(2)(A), each response lists: i) the preparer or person under whose direct supervision the response was prepared; and ii) a sponsoring witness. Pursuant to 16 TAC § 22.144(c)(2)(I), DHL Supply Chain stipulates that the responses may be treated by all parties as if filed under oath. Pursuant to 16 TAC § 22.144(c)(1), these responses are timely filed.



Respectfully submitted,

Lynn Sherman

State Bar No. 18243630

P.O. Box 5605

Austin, Texas 78763


(512) 431-6515

lsherman@h2otx.com

ATTORNEY FOR DHL SUPPLY CHAIN

CERTIFICATE OF SERVICE

I hereby certify that on this 7th day of August 2023, a true and correct copy of the foregoing document was electronically filed with the Commission via the PUC Interchange in accordance with SOAH Order No.2 in this proceeding and the Commission's Second Order Suspending Rules in Docket No. 50664.

By:  _____
Lynn Sherman

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

Response: DIIL Supply Chain's property is not directly impacted by Segment V1, Segment V3, or Segment V4.

Prepared by: Lynn Sherman, legal counsel for DIIL Supply Chain

Sponsoring witness: Jason E. Buntz

Watkins RFI No. 1-2. Please confirm that your property is not directly impacted by any of Segments M5-R2-R5-U3-V3-V4.

Response: DIIL Supply Chain's property is not directly impacted by Segment M5, Segment R2, Segment R5, Segment U3, Segment V3, or Segment V4.

Prepared by: Lynn Sherman, legal counsel for DIIL Supply Chain

Sponsoring witness: Jason E. Buntz

Watkins RFI No. 1-3. 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: Subject to the presentation of evidence not currently found in the record that would necessitate a different response, DIIIL Supply Chain would not oppose the modified version of Route 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.

Prepared by: Lynn Sherman, legal counsel for DHI, Supply Chain

Sponsoring witness: Geoffrey A. Meyer

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: Subject to the presentation of evidence not currently found in the record that would necessitate a different response, DIIIL Supply Chain would not oppose the modified version of Route 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.

Prepared by: Lynn Sherman, legal counsel for DHIIL Supply Chain

Sponsoring witness: Geoffrey A. Meyer



Filing Receipt

Filing Date - 2023-08-10 03:12:03 PM

Control Number - 55067

Item Number - 1619

**SOAH Docket No. 473-23-21216
PUC Docket No. 55067**

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	§ § § § § § §	BEFORE THE STATE OFFICE OF ADMINISTRATIVE HEARINGS
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**J L LOGAN FAMILY LIMITED PARTNERSHIP, LTD AND J L LOGAN FAMILY,
LTD.'S RESPONSE TO EDGAR BRENT WATKINS AND MARY ANN LIVENGOOD'S
FIRST SET OF REQUESTS FOR INFORMATION**

J L Logan Family Limited Partnership, Ltd and J L Logan Family, Ltd. (collectively "J L Logan Properties") files this their response to the First Request for Information from Edgar Brent Watkins and Mary Ann Livengood. J L Logan Family Limited Partnership, Ltd and J L Logan Family, Ltd. (collectively "J L Logan Properties") agree and stipulate that all parties may treat these responses as if the answer were filed under oath.

SIGNED this 10th day of August, 2023.

By: /s/ Deborah M. Atchley
Deborah M. Atchley, GP
J L Logan Family Limited Partnership
13682 S County Line Rd
Justin, Tx 76247
Phone No. 817-715-5190
dma1891@gmail.com

By: /s/ Deborah M. Atchley
Deborah M. Atchley, GP
J L Logan Family, Ltd.
13682 S County Line Rd
Justin, Tx 76247
Phone No. 817-715-5190
dma1891@gmail.com

**SOAH Docket No. 473-23-21216
PUC Docket No. 55067**

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	§ § § § § § §	BEFORE THE STATE OFFICE OF ADMINISTRATIVE HEARINGS
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**J L LOGAN FAMILY LIMITED PARTNERSHIP, LTD AND J L LOGAN FAMILY,
LTD.'S RESPONSE TO EDGAR BRENT WATKINS AND MARY ANN LIVENGOOD'S
FIRST SET OF REQUESTS FOR INFORMATION**

Watkins RFI No. 1-1. Please confirm that your properties are 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 oppose.
- b. Not applicable.

Watkins RFI No. 1-3. Please confirm that your properties are 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 M2-M3-R4-V2?
- b. If you cannot agree to support or “not oppose” Route 179-Watkins, please explain why.

Response:

- a. Not oppose.
- b. Not applicable.



Filing Receipt

Filing Date - 2023-08-04 08:50:45 AM

Control Number - 55067

Item Number - 1565

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

APPLICATION OF ONCOR ELECTRIC	§	
DELIVERY COMPANY LLC TO	§	BEFORE THE STATE OFFICE
AMEND ITS CERTIFICATE OF	§	
CONVENIENCE AND NECESSITY FOR	§	OF
THE RAMHORN HILL – DUNHAM 345	§	
KV TRANSMISSION LINE IN DENTON	§	ADMINISTRATIVE HEARINGS
AND WISE COUNTIES	§	

**TOWN OF NORTHLAKE’S RESPONSES
TO 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 counsel of record, Tyler Topper, Morgan & Williamson, LLP, 701 South Taylor, Suite 440, Amarillo, Texas 79101.

Intervenor Town of Northlake (“Northlake”) files this its Response to Edgar Brent Watkins and Mary Ann Livengood’s First Requests for Information (“RFIs”). Northlake’s written responses, including production of documents, if any, are attached hereto and incorporated by reference. These responses are made in the spirit of cooperation without waiving Northlake’s right to contest the admissibility of any of this information at hearing. Pursuant to P.U.C. PROC. R 22.144(c)(2)(A), each response lists the preparer or person under whose direct supervision the response was prepared and the sponsoring witness, if any. Pursuant to P.U.C. PROC. R 22.144(c)(2)(F), Northlake stipulates that its responses may be treated by all Parties as if they were made under oath. For purposes of these responses, Northlake uses the same definitions set out in Edgar Brent Watkins and Mary Ann Livengood’s RFIs. These responses may be supplemented if additional responsive documents are identified by Northlake.