

Respectfully submitted,

/s/ *Stephen C. Dickman*

Stephen C. Dickman

State Bar No. 05836500

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**ATTORNEY FOR THE TOWN OF
NORTHLAKE**

CERTIFICATE OF SERVICE

The undersigned hereby certifies that, unless otherwise ordered by the presiding officer, notice of the filing of this document was provided to all parties of record via electronic mail on August 4, 2023 in accordance with the Order Suspending Rules issued in Project No. 50664.

/s/ *Stephen C. Dickman*

**NORTHLAKE RESPONSES TO
BRENT WATKINS AND MARY ANN LIVENGOOD'S
FIRST 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.

Preparer: Stephen C. Dickman, Attorney for Town of Northlake and Drew Corn, Northlake City Manager

Sponsoring Witness: Undetermined at this time.

Watkins RFI No. 1-2. You have previously indicated your general support for Route 179 with several caveats (e.g., utilizing Segments C4-C6 instead of C7-E2-E1, etc.). Route 179 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, provided also that the caveats raised in your testimony are also adequately resolved?
- b. If you cannot agree to support or “not oppose” Route 179R (provided also that the caveats raised in your testimony are also adequately resolved), please explain why.

Response:

- a. Yes, Northlake would support or not oppose such modified “Route 179R” provided the caveats and route adjustments requested in Northlake’s testimony are followed or resolved.
- b. Not applicable per above response.

Preparer: Stephen C. Dickman, Attorney for Town of Northlake and Drew Corn, Northlake City Manager

Sponsoring Witness: Undetermined at this time.

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.

Preparer: Stephen C. Dickman, Attorney for Town of Northlake and Drew Corn, Northlake City Manager

Sponsoring Witness: Undetermined at this time.

Watkins RFI No. 1-4. You have previously indicated your general support for Route 179 with several caveats (e.g., utilizing Segments C4-C6 instead of C7-E2-E1, etc.). Route 179 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, provided also that the caveats raised in your testimony are also adequately resolved?
- b. If you cannot agree to support or “not oppose” Route 179-Watkins (provided also that the caveats raised in your testimony are also adequately resolved), please explain why.

Response:

- a. Yes, Northlake would support or not oppose such modified “Route 179-Watkins” provided the caveats and route adjustments requested in Northlake’s testimony are followed or resolved.
- b. Not applicable per above response.

Preparer: Stephen C. Dickman, Attorney for Town of Northlake and Drew Corn, Northlake City Manager

Sponsoring Witness: Undetermined at this time.



Filing Receipt

Filing Date - 2023-08-10 03:08:17 PM

Control Number - 55067

Item Number - 1618

**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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**DEBORAH M. ATCHLEY, TRUSTEE’S RESPONSES TO EDGAR BRENT WATKINS
AND MARY ANN LIVENGOOD’S FIRST SET OF REQUESTS FOR INFORMATION**

Deborah M. Atchley, Trustee (“Atchley”), files this her response to the First Request for Information from Edgar Brent Watkins and Mary Ann Livengood. Atchley agrees and stipulates 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, Trustee
2732 Newcastle Dr.
Grapevine, Tx 76051
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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**DEBORAH M. ATCHLEY, TRUSTEE'S 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. 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 - 2023-08-10 03:04:33 PM

Control Number - 55067

Item Number - 1617

**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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**BUD & MICKY LOGAN FAMILY, LP AND BUD & MICKY LOGAN FAMILY LTD.
PARTNERSHIP'S RESPONSE TO EDGAR BRENT WATKINS AND MARY ANN
LIVENGOOD'S FIRST SET OF REQUESTS FOR INFORMATION**

Bud & Micky Logan Family, LP and Bud & Micky Logan Family Ltd. Partnership (collectively "Bud and Micky Logan Properties") files this their response to the First Request for Information from Edgar Brent Watkins and Mary Ann Livengood. Bud & Micky Logan Family, LP and Bud & Micky Logan Family Ltd. Partnership (collectively "Bud and Micky 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/ Kellye Southall

Kellye Southall, as power of attorney for Robert Logan, the General Partner for Bud & Mickey Logan Family Ltd and Bud & Mickey Logan Family Ltd, Partnership.
13194 S. County Line Rd
Justin, TX 76247
817-807-7880
kellyesouthall@verizon.net

**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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**BUD & MICKY LOGAN FAMILY, LP AND BUD & MICKY LOGAN FAMILY LTD.
PARTNERSHIP'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 - 2023-08-09 12:45:18 PM

Control Number - 55067

Item Number - 1604

**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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**FLOYD T. MCCURDY TESTAMENTARY TRUST’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, the Floyd T. McCurdy Testamentary Trust 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 FLOYD T. MCCURDY
TESTAMENTARY TRUST**

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

**FLOYD T. MCCURDY TESTAMENTARY TRUST'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: Floyd T. McCurdy Testamentary Trust

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: Floyd T. McCurdy Testamentary Trust

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: Margret 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: Floyd T. McCurdy Testamentary Trust



Filing Receipt

Filing Date - 2023-08-09 12:45:55 PM

Control Number - 55067

Item Number - 1605

**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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**PEGGY LOGAN MCCURDY’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, the Peggy Logan McCurdy 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 PEGGY LOGAN
MCCURDY**

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

**PEGGY LOGAN MCCURDY'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: Peggy Logan McCurdy

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: Peggy Logan McCurdy

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: Margret 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: Peggy Logan McCurdy



Filing Receipt

Filing Date - 2023-08-10 11:06:24 AM

Control Number - 55067

Item Number - 1616

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

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

**NEW DIMENSION INVESTMENTS II, 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 attorney of record, Tyler Topper, Morgan Williamson LLP, 701 South Taylor, Suite 440, Amarillo, TX 79101.

New Dimension Investments II, LLC (New Dimension Investments) files its Responses to Edgar Brent Watkins' and Mary Ann Livengood's (Watkins) First Request for Information (RFI) to New Dimension Investments. This RFI was served on counsel for New Dimension Investments after 3:00 p.m. on August 2, 2023. Therefore, the deadline for New Dimension Investments to file a response to Watkins' First RFI is calculated as though it were received on August 3, 2023.¹ This response is therefore timely filed on or before August 10, 2023.² Pursuant to 16 TAC § 22.144(c)(2)(F), New Dimension Investments agrees and stipulates that all parties may treat the responses as if the answers were filed under oath.

¹ See 16 Texas Administrative Code (TAC) § 22.133(b)(2).

² See SOAH Order No. 2 Memorializing Prehearing Conference; Finding Notice and Application Sufficient; Adopting Procedural Schedule; Setting Hearing on the Merits at 4 (Jun. 28, 2023) (the deadline to file responses to RFIs on Intervenor direct testimony is five business days after receipt).

Respectfully submitted,

SPENCER FANE, LLP
816 Congress Avenue
Suite 1200
Austin, TX 78701
Telephone: (512) 840-4550
Facsimile: (512) 840-4551

William A. Faulk, III
State Bar No. 24075674
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/s/ Rashmin J. Asher

Rashmin J. Asher
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Taylor P. Denison
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**ATTORNEYS FOR NEW DIMENSION
INVESTMENTS II, LLC**

CERTIFICATE OF SERVICE

I hereby certify that, unless otherwise ordered by the presiding officer, notice of the filing of this document was provided to all parties of record via electronic mail on August 10, 2023, in accordance with the Order Suspending Rules, issued in Project No. 50664.

/s/ Rashmin J. Asher

Rashmin J. Asher

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

NEW DIMENSION INVESTMENTS' RESPONSE TO
WATKINS' FIRST RFI

Watkins 1-1 Please confirm that your property is not directly impacted by any of
Segments V1-V3-V4.

RESPONSE: Confirmed.

Prepared by: Counsel
Sponsor: Steve Elis

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

NEW DIMENSION INVESTMENTS' RESPONSE TO
WATKINS' FIRST RFI

- Watkins 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: New Dimension Investments would not oppose a modified version of Route 179 identified as “Route 179R” in the Direct Testimony of T. Brian Almon that uses Segments V1-V3-V4 instead of Segment V2.

Prepared by: Counsel
Sponsor: Steve Elis

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

NEW DIMENSION INVESTMENTS' RESPONSE TO
WATKINS' FIRST RFI

Watkins 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: Counsel
Sponsor: Steve Elis

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

**NEW DIMENSION INVESTMENTS' RESPONSE TO
WATKINS' FIRST RFI**

Watkins 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:

New Dimension Investments would not oppose a modified version of Route 179 identified as “Route 179-Watkins” in the Direct Testimony of T. Brian Almon that uses Segments M5-R2-R5-U3-V3-V4 instead of Segments M2-M3-R4-V2.

Prepared by:
Sponsor:

Counsel
Steve Elis



Filing Receipt

Filing Date - 2023-08-09 04:01:21 PM

Control Number - 55067

Item Number - 1608

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

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
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**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. RESPONSES

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.

s/ Christopher M. Lowry
Christopher M. Lowry



Filing Receipt

Filing Date - 2023-08-09 10:14:35 PM

Control Number - 55067

Item Number - 1614

SHAWN WELLS RESPONSE TO EDGAR BRENT WATKINS AND MARY ANN LIVENGLOOD'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 LIVENGLOOD'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.



Filing Receipt

Filing Date - 2023-08-09 11:33:52 AM

Control Number - 55067

Item Number - 1588

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

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

HILLWOOD PARTIES’ RESPONSE TO
EDGAR BRENT WATKINS AND MARY ANN LIVENGOOD WATKINS’
FIRST REQUESTS FOR INFORMATION

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

Hillwood Parties file these responses 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,

ENOCH KEVER PLLC

Andrew Kever

State Bar No. 11367050

Carolyn E. Shellman

State Bar No. 18196200

Christopher J. Kirby

State Bar No. 24116620

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akever@enochkever.com

cshellman@enochkever.com

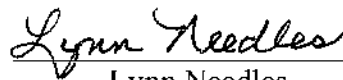
ckirby@enochkever.com

By: 

ATTORNEYS FOR HILLWOOD PARTIES

CERTIFICATE OF SERVICE

I certify that a copy of this document was served by electronic mail, on all parties of record in this proceeding on August 9, 2023, in accordance with SOAH Order No. 1 in the above-styled proceeding and the Commission's Second Order Suspending Rules, issued in Project No. 50664.



Lynn Needles

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

**HILLWOOD PARTIES' RESPONSE TO
WATKINS' FIRST REQUEST FOR INFORMATION**

WATKINS—HILLWOOD 1-1:

Please confirm that your property is not directly impacted by any of Segments V1-V3-V4.

RESPONSE:

We can confirm that Segments V1-V3-V4 do not cross property of the Hillwood Parties.

Prepared by or under the direction of the following Sponsor: L. Russell Laughlin

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

**HILLWOOD PARTIES' RESPONSE TO
WATKINS' FIRST REQUEST FOR INFORMATION**

WATKINS—HILLWOOD 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:

We support Route 179 as contemplated in Oncor’s application. However, if the only difference between Route 179 and Mr. Almon’s suggested Route 179R is that Segment V2 in Route 179 is replaced by Segments V1-V3-V4 in Route 179R, and if Oncor and the other parties were to accept Route 179R as the uncontested agreed settlement route, Hillwood Parties would not oppose the agreed settlement route.

Prepared by or under the direction of the following Sponsor: L. Russell Laughlin

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

**HILLWOOD PARTIES' RESPONSE TO
WATKINS' FIRST REQUEST FOR INFORMATION**

WATKINS—HILLWOOD 1-3:

Please confirm that your property is not directly impacted by any of Segments M5-R2-R5-U3-V3-V4.

RESPONSE:

We can confirm that Segments M5-R2-R5-U3-V3-V4 do not cross property of the Hillwood Parties.

Prepared by or under the direction of the following Sponsor: L. Russell Laughlin

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

**HILLWOOD PARTIES' RESPONSE TO
WATKINS' FIRST REQUEST FOR INFORMATION**

WATKINS—HILLWOOD 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:

We support Route 179 as contemplated in Oncor’s application. However, if the only difference between Route 179 and Mr. Almon’s suggested Route 179-Watkins is that Segment M2-M3-R4-V2 in Route 179 is replaced by Segments M5-R2-R5-U3-V3-V4 in Route 179-Watkins, and if Oncor and the other parties were to accept Route 179-Watkins as the uncontested agreed settlement route, Hillwood Parties would not oppose the agreed settlement route.

Prepared by or under the direction of the following Sponsor: L. Russell Laughlin



Filing Receipt

Filing Date - 2023-08-03 01:46:21 PM

Control Number - 55067

Item Number - 1529

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 THE RAMHORN HILL – § OF
DUNHAM 345 KV TRANSMISSION §
LINE IN DENTON AND WISE §
COUNTIES § ADMINISTRATIVE HEARINGS
§

**ROSS ARTHUR BREWER 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, Ross Arthur Brewer 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.

Respectfully Submitted,

UNDERWOOD LAW FIRM, P.C.
500 S. Taylor Street, Suite 1200
P. O. Box 9158
Amarillo, Texas 79105-9158
Telephone: (806) 376-5613
Facsimile: (806) 379-0316

By: 


Todd W. Boykin
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Lindsey Rusler
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lindsey.rusler@uwlaw.com
C. Jason Fenton
State Bar No. 24087505
jason.fenton@uwlaw.com

ATTORNEYS FOR LUIS B. TALAMANTE

CERTIFICATE OF SERVICE

I hereby certify that on August 3, 2023, the foregoing document is being electronically filed in the Public Utility Commission's Interchange system as required by Orders in this docket and in compliance with PUC Procedural Rule 22.74.


Todd W. Boykin

**EDGAR BRENT WATKINS AND MARY ANN LIVENGOOD'S FIRST REQUEST
FOR INFORMATION TO ROSS ARTHUR BREWER**

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), we 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: Ross Arthur Brewer 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), we 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: Ross Arthur Brewer 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 - 2023-08-03 01:48:14 PM

Control Number - 55067

Item Number - 1530

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 THE RAMHORN HILL –	§	OF
DUNHAM 345 KV TRANSMISSION	§	
LINE IN DENTON AND WISE	§	
COUNTIES	§	ADMINISTRATIVE HEARINGS
	§	

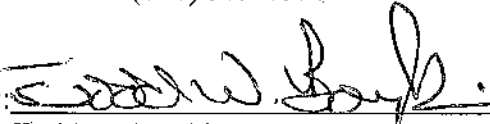
H3M PROPERTY HOLDINGS, LP'S RESPONSE TO EDGAR BRENT WATKINS AND
MARY ANN LIVENGOOD'S
FIRST SET OF REQUESTS FOR INFORMATION

TO: Edgar Brent Watkins and Mary Ann Livengood by and through their attorneys of record, 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, H3M Property Holdings, LP hereby serves its 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.

Respectfully Submitted,

UNDERWOOD LAW FIRM, P.C.
500 S. Taylor Street, Suite 1200
P. O. Box 9158
Amarillo, Texas 79105-9158
Telephone: (806) 376-5613
Facsimile: (806) 379-0316

By: 


Todd W. Boykin
State Bar No. 02791600
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Lindsey Rusler
State Bar No. 24069080
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C. Jason Fenton
State Bar No. 24087505
jason.fenton@uwlaw.com

ATTORNEYS FOR LUIS B. TALAMANTE

CERTIFICATE OF SERVICE

I hereby certify that on August 3, 2023, the foregoing document is being electronically filed in the Public Utility Commission's Interchange system as required by Orders in this docket and in compliance with PUC Procedural Rule 22.74.


Todd W. Boykin

**EDGAR BRENT WATKINS AND MARY ANN LIVENGOOD'S FIRST REQUEST
FOR INFORMATION TO H3M PROPERTY HOLDINGS, LP**

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), we 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: H3M Property Holdings, LP 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), we 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: H3M Property Holdings, LP 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 - 2023-08-04 04:08:02 PM

Control Number - 55067

Item Number - 1574

CHARLES DEE AND GRETCHEN BROWN'S RESPONSE TO EDGAR BRENT WATKINS
AND MARY ANN LIVENGOOD'S FIRST SET OF REQUESTS FOR INFORMATION
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 THE RAMHORN HILL - § OF
DUNHAM 345 KV TRANSMISSION §
LINE IN DENTON AND WISE §
COUNTIES § ADMINISTRATIVE HEARINGS
§

**CHARLES DEE AND GRETCHEN BROWN'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,
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, Charles Dee and Gretchen Brown hereby serves their 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.

Respectfully Submitted,

Charles Dee and Gretchen Brown
507 County Road 4840
Haslet, TX 76052
817-313-2410
Cdbro61@gmail.com
817-366-8419
F16swgal@aol.com

CHARLES DEE AND GRETCHEN BROWN'S RESPONSE TO EDGAR BRENT WATKINS
AND MARY ANN LIVENGOOD'S FIRST SET OF REQUESTS FOR INFORMATION
SOAH DOCKET NO. 473-23-21216
PUC DOCKET NO. 55067

CERTIFICATE OF SERVICE

I hereby certify that on August 4, 2023, the foregoing document is being electronically filed in the Public Utility Commission's interchange system as required by Orders in this docket and in compliance with PUC Procedural Rule 22.74.

Gretchen Brown

CHARLES DEE AND GRETCHEN BROWN'S RESPONSE TO EDGAR BRENT WATKINS
AND MARY ANN LIVENGOOD'S FIRST SET OF REQUESTS FOR INFORMATION
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 CHARLES DEE AND GRETCHEN BROWN**

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.
- 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:

- a. Our property is not directly impacted by any of Route 179R.
- b. We would not oppose Route 179R.
- c. n/a

Watkins RFI No. 1-2. In the Direct Testimony of T. Brian Almon (Docket Item No. 1426), Mr. Almon identified another 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.
- 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:

- a. Our property is not directly impacted by any of Route 179-Watkins.
- b. We would not oppose Route 179-Watkins.
- c. n/a



Filing Receipt

Filing Date - 2023-08-14 10:13:40 AM

Control Number - 55067

Item Number - 1644

**EDGAR BRENT WATKINS AND MARY ANN LIVENGOOD'S FIRST SET OF
REQUESTS FOR INFORMATION TO JUSTIN BUTLER**

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.

Confirmed

- b. Would you support or "not oppose" Route 179R?

Yes

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

Response:

Watkins RFI No. 1-2. In the Direct Testimony of T. Brian Almon (Docket Item No. 1426), Mr. Almon identified another 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.

Confirmed

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

Yes

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

Response:



Filing Receipt

Filing Date - 2023-08-11 12:42:32 PM

Control Number - 55067

Item Number - 1632

**EDGAR BRENT WATKINS AND MARY ANN LIVENGOOD'S FIRST SET OF
REQUESTS FOR INFORMATION TO SHELLY BUTLER**

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.

Confirmed

- b. Would you support or "not oppose" Route 179R?

Yes

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

Response:

Watkins RFI No. 1-2. In the Direct Testimony of T. Brian Almon (Docket Item No. 1426), Mr. Almon identified another 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.

Confirmed

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

Yes

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

Response:



Filing Receipt

Filing Date - 2023-08-08 11:52:27 AM

Control Number - 55067

Item Number - 1583

PUC DOCKET NO. 55067

SOAH DOCKET NO. 473-23-21216

JOSHUA CHUTE

RESPONSE TO EDGAR BRENT WATKINS AND MARY ANN LIVENGOOD'S

FIRST REQUESTS FOR INFORMATION TO JOSHUA CHUTE

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: AO-A4-B1-B61B62-C1-C21-C23-C7-E2-E1-E6-G1-G3-H41-H42-H8-I8-J3-K1-L5-L4-L3-L2-M1-M2M3-R4-V1-V3-V4-Z.

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

- a. The property I own would not be directly affected by any of Route 179-R.
- b. I would not oppose Route 179-R.
- c. N/A

Prepared by: Joshua Chute

Sponsored by: Joshua Chute

Watkins RFI No. 1-2. In the Direct Testimony of T. Brian Almon (Docket Item No. 1426), Mr. Almon identified another modified version of Route 179, which was identified as "Route 179-Watkins," consisting of the following combination of Segments: AO-A4-B 1-B61-B62-C1-C21-C23 -C7-E2-IF, 1 -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.
- 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:

- a. The property I own would not be directly affected by any of Route 179-Watkins.

b. I would not oppose Route 179-Watkins.

c. N/A

Prepared by: Joshua Chute

Sponsored by: Joshua Chute

Response:

A handwritten signature in black ink, appearing to read "Joshua Chute". The signature is written in a cursive, flowing style.

8/8/2023



Filing Receipt

Filing Date - 2023-08-10 08:32:17 PM

Control Number - 55067

Item Number - 1624

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.

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: To the best of my knowledge my property does not appear to be affected by Route 179R. Therefore, I do not currently oppose Route 179R. I reserve the right to change this declaration in the future if it becomes clear that Route 179R directly or indirectly will impact my property.

Watkins RFI No. 1-2. In the Direct Testimony of T. Brian Almon (Docket Item No. 1426), Mr. Almon identified another 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.

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: To the best of my knowledge my property does not appear to be affected by Route 179-Watkins. Therefore, I do not currently oppose Route 179-Watkins. I reserve the right to change this declaration in the future if it becomes clear that Route 179-Watkins directly or indirectly will impact my property.

Craig D. K. Jones and Alice M. Jones



Filing Receipt

Filing Date - 2023-08-09 05:48:34 PM

Control Number - 55067

Item Number - 1613

PUC DOCKET NO. 55067

SOAH DOCKET NO. 473-23-21216

TRACY MILLIS

RESPONSE TO EDGAR BRENT WATKINS AND MARY ANN LIVENGOD'S

FIRST REQUESTS FOR INFORMATION TO TRACY MILLIS

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: AO-A4-B1-B61B62-C1-C21-C23-C7-E2-E1-E6-G1-G3-H41-H42-H8-I8-J3-K1-L5-L4-L3-L2-M1-M2M3-R4-V1-V3-V4-Z.

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

- a. The property I live at would not be directly affected by any of Route 179-R.
- b. I would not oppose Route 179-R.
- c. N/A

Prepared by: Tracy Millis

Sponsored by: Tracy Millis

Watkins RFI No. 1-2. In the Direct Testimony of T. Brian Almon (Docket Item No. 1426), Mr. Almon identified another modified version of Route 179, which was identified as "Route 179-Watkins," consisting of the following combination of Segments: AO-A4-B 1-B61-B62-C1-C21-C23 -C7-E2-IF, 1 -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.
- 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:

- a. The property I live at would not be directly affected by any of Route 179-Watkins.

b. I would not oppose Route 179-Watkins.

c. N/A

Prepared by: Tracy Millis

Sponsored by: Tracy Millis

Response:

 8/8/23



Filing Receipt

Filing Date - 2023-08-07 11:29:43 AM

Control Number - 55067

Item Number - 1578

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

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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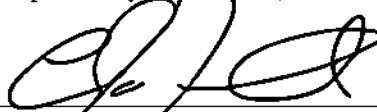
**WAYNE AND NORMA WILKERSON'S
RESPONSE TO EDGAR BRENT WATKINS AND MARY ANN LIVENGOOD'S
FIRST REQUESTS FOR INFORMATION TO WAYNE AND NORMA WILKERSON**

To: Edgar Brent Watkins and Mary Ann Livengood, by and through their attorney of record, Tyler Topper and Christian Stewart, Morgan Williamson LLP, 701 South Taylor Street, Amarillo, Texas 79101

Wayne and Norma Wilkerson (Wilkersons) provide this response to Edgar Brent Watkins and Mary Ann Livengood's First Request for Information. The Wilkersons stipulate that the following responses to the requests for information may be treated by all parties as if the answer was filed under oath.

Dated: August 7, 2023

Respectfully submitted,



C. Joe Freeland
State Bar No. 07417500

Mathews & Freeland, LLP
8140 N. MoPac Expy, Ste. 4-240
Austin, Texas 78759
Telephone (512) 404-7800
Facsimile (512) 703-2785
Email: jfreeland@mandf.com
**ATTORNEYS FOR WAYNE AND NORMA
WILKERSON**

CERTIFICATE OF SERVICE

I certify that a copy of this document was served via email on August 7, 2023 in accordance with the requirements of 16 Tex. Admin. Code § 22.74, Order No. 1 in PUC Docket No. 50946, and Order No. 1 in PUC Docket No. 50664.



C. Joe Freeland

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

**WAYNE AND NORMA WILKERSON'S
RESPONSE TO EDGAR BRENT WATKINS AND MARY ANN LIVENGOOD'S
FIRST REQUESTS FOR INFORMATION TO WAYNE AND NORMA WILKERSON**

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.
- 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:

- a. Our property would not be directly affected by any of Route 179R.
- b. We would not oppose Route 179R.
- c. N/A

Prepared by: Wayne Wilkerson

Sponsored by: Wayne Wilkerson

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

WAYNE AND NORMA WILKERSON'S
RESPONSE TO EDGAR BRENT WATKINS AND MARY ANN LIVENGOOD'S
FIRST REQUESTS FOR INFORMATION TO WAYNE AND NORMA WILKERSON

Watkins RFI No. 1-2. In the Direct Testimony of T. Brian Almon (Docket Item No. 1426), Mr. Almon identified another 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.
- 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:

- a. Our property would not be directly affected by any of Route 179-Watkins.
- b. We would not oppose Route 179-Watkins.
- c. N/A

Prepared by: Wayne Wilkerson

Sponsored by: Wayne Wilkerson



Filing Receipt

Filing Date - 2023-08-04 02:37:55 PM

Control Number - 55067

Item Number - 1573

**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	§ § § § § § §	BEFORE THE STATE OFFICE OF ADMINISTRATIVE HEARINGS
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**EDGAR BRENT WATKINS AND MARY ANN LIVENGOOD’S FIRST SET OF
REQUESTS FOR INFORMATION TO RUSSELL SHERWOOD**

Pursuant to PUC Procedural Rule 22.141 and 22.144, Intervenor Edgar Brent Watkins and Mary Ann Livengood (“Watkins”) request that Russell Sherwood (“Sherwood”) provide responses to the following Requests for Information (“RFI” or “RFIs”).

Please answer the attached questions in accordance with the procedural schedule and orders issued in this case, the Commission’s Procedural Rules, the Texas Rules of Civil Procedure, and other applicable law. Please copy the question immediately above the answer to each question. Please state the name of the witness or witnesses in this case who will sponsor the answer to the question at the hearing and can vouch for the truth of the answer. The answer should be filed under oath, or the response should stipulate in writing that the answer can be treated by all parties as if filed under oath.

The questions should be answered in sufficient detail to fully present all of the relevant facts. In answering this request, Sherwood is requested to furnish such

information as is available to Sherwood, including information Sherwood is able to obtain by due diligence from Sherwood's present or former attorneys, accountants, investigators, consultants, employees, agents, and persons acting on Sherwood's behalf.

If the items requested to be produced herein have already been provided in other discovery answers to any party, it shall not be necessary to duplicate such production. It shall be sufficient that the answer containing the requested information is clearly identified. Where only a portion of the requested information has been previously provided, this shall be disclosed and all information necessary to fully and completely answer this discovery request shall be provided in your answer.

If there is a relevant change in Sherwood's answer after it is submitted such that it is no longer complete or accurate, please submit an amended answer, under oath, as a supplement to the original answer within five (5) working days of Sherwood's discovery of the need for such amendment.

Please provide Sherwood's response to the undersigned counsel:

Tyler Topper
Texas Bar No. 24059263
ttopper@mw-law.com
Christian Stewart
Texas Bar No. 24013569
cstewart@mw-law.com
MORGAN WILLIAMSON LLP
701 South Taylor, Suite 440
Amarillo, Texas 79101
Telephone: (806) 358-8116
Facsimile: (806) 350-7642

DEFINITIONS

1. “Sherwood” refers to Russell Sherwood, and any person acting or purporting to act on their behalf, including without limitation, attorneys, agents, advisors, investigators, representatives, employees, or other persons.

2. “You” and “your” refers to the party to which the RFI is directed.

3. “Application” means the Application by Oncor Electric Delivery Company, LLC to Amend its Certificate of Convenience and Necessity for a Transmission Line in Denton and Wise Counties.

4. “Communication” means any oral, written, or electronic statements, representations, discussions, conversations, speeches, meetings, remarks, questions, answers, panel discussions, or symposium of which Sherwood has knowledge, information or belief.

5. “Concerning” means, in whole or in part, directly or indirectly, referring to, relating to, being connected with, commenting on, responding to, showing, describing, analyzing, reflecting embodying, mentioning, or constituting the subject matter identified in the request.

6. “Date” means the exact day, month, and year, if ascertainable or, if not, the best approximation.

7. “Describe” or “identify” when used in reference to a document, means you must state, to the fullest extent possible, the following:

a. The nature (e.g. letter, handwritten note) of the document;

- b. The title or heading that appears on the document;
- c. The date of the document and the date of each addendum, supplement, or other addition or change;
- d. The identity of the author of the document; any signatory or signatories of the document; and the person on whose behalf or at whose request or direction the document was prepared or delivered; and
- e. The present location of the document, and the name, address, position or title, and telephone number(s) of the person(s) having custody of the document.

8. The terms “document” or “documents” are used in their broadest sense to include, but not be limited to, all written or graphic matter of every kind and description whether printed, produced, or reproduced, by any process whether visually, magnetically, mechanically, electronically, or by hand, whether final or draft, original or reproduction whether privileged or otherwise excludable from discovery, and whether or not in your actually or constructive possession, custody or control. These shall also be construed to include every copy of a document where there copy contains any commentary or notation of any kinds that does not appear on the original or any other copy.

9. The words “segment” or “segments” reference the individually numbered/lettered portions of the preferred and alternative routes described in the Application.

10. Words used in the plural shall also be taken to mean and to include the singular. Words used in the singular shall also be taken to mean and include the plural.

11. The present tense shall be construed to include the past tense, and the past tense shall be construed to include the present tense.

12. “Each” shall be construed to include the word “every” and “every” shall be construed to include the word “each”.

13. The term “including” means “including, but not limited to”.

14. Oncor’s “Route 179” consists 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-V2-Z.

15. T. Brian Almon’s “Route 179R” consists 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.

16. T. Brian Almon’s “Route 179-Watkins” consists 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.

INSTRUCTIONS

1. As to any request for information to which you are unable to respond to in whole or in part for any reason, please state the grounds for inability respond. When you believe that a complete answer to a particular request for information or part thereof is not possible, please answer each request for information to the extent possible and furnish a statement explaining: (a) the reason for your inability to respond further; and (b) whatever information or knowledge you have concerning the non-responsive portion.

2. For each document or other requested information that you assert is privileged, please comply with the requirements of Rule 193.3 of the Texas Rules of Civil Procedure and P.U.C. Proc. R. 22.144.

3. For every document that no longer exists or cannot be located; identify the document; state how and when the document passed out of existence, or when it could no longer be located; and state the reason(s) for the disappearance; identify each person having knowledge about the disposition or loss of the document; and identify each document evidencing the existence or nonexistence of each document that cannot be located.

4. It is requested that all documents that might impact on the subject matter of the Application be preserved and that any ongoing process of document destruction involving such documents cease.

5. Furnish all requested documents available to you and known by you, or in your possession, custody, or control or that of your agents and attorneys.

6. In those instances where you choose to answer a request for information by referring to a specific document or record, it is requested that the specification be in sufficient detail to permit the requestor to locate and identify the record(s) and/or document(s) from which the answer is to be ascertained, as readily as you can.

7. In those instances when requested information or documents are stored only on software, computer based information, or other data compilations, you should either produce the raw data along with all codes and programs for translating it into usable form, or produce the information or documents in a finished usable form that includes all necessary glossaries, keys, indices for interpretation of the material.

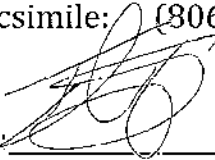
8. Please respond to each request for information and indicate clearly the request for information to which each response is responsive. When requests for information contain subparts, indicate in your answer the subpart to which each particular part of your response is in response.

9. You are under a duty to supplement your responses to these requests for information that are incomplete or incorrect when made. Furthermore, you are under a duty to timely supplement and/or amend your responses if you receive, obtain, or generate information within the scope of any request for information between the time of the original responses and the conclusion of this proceeding.

10. Unless otherwise indicated, the discovery requested in these requests is for information related to the time period from June, 2018 through and including the present. All requested documents, data compilations, and recordings whenever actually prepared or generated that related to this time period are to be produced.

Respectfully submitted,

MORGAN WILLIAMSON, LLP
701 South Taylor, Suite 440
Amarillo, Texas 79101
Telephone: (806) 358-8116
Facsimile: (806) 350-7642

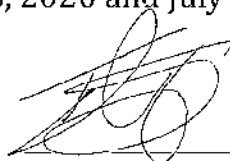
By: 

Tyler Topper
Texas Bar No. 24059263
ttopper@mw-law.com
Christian Stewart
Texas Bar No. 24013569
cstewart@mw-law.com

**ATTORNEYS FOR EDGAR BRENT
WATKINS AND MARY ANN LIVENGOOD**

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.



Tyler Topper

**EDGAR BRENT WATKINS AND MARY ANN LIVENGOOD'S FIRST SET OF
REQUESTS FOR INFORMATION TO RUSSELL SHERWOOD**

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.
- 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:

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

- a. **Since Segment M8 is not used in Route 179R, my airport nor personal property are not affected by Route 179R.**

Would you support or "not oppose" Route 179R?

- b. **Since Segment M8 is not used in Route 179R, I have no opposition to Route 179R and would therefore support it.**

Watkins RFI No. 1-2. In the Direct Testimony of T. Brian Almon (Docket Item No. 1426), Mr. Almon identified another 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.

- 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:

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

- a. **Since Segment M8 is not used in Route 179, my airport nor personal property are not affected by Route 179.**

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

- b. **Since Segment M8 is not used in Route 179, I have no opposition to Route 179 and would therefore support it.**



Filing Receipt

Filing Date - 2023-08-09 09:29:13 AM

Control Number - 55067

Item Number - 1586

**EDGAR BRENT WATKINS AND MARY ANN LIVENGOOD'S FIRST SET OF
REQUESTS FOR INFORMATION TO HAROLD WOOLSEY AND LISA LYNOS**

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. *Our property would not be directly affected by any route 179R*
- b. Would you support or "not oppose" Route 179R?
not oppose
- c. If you cannot agree to support or "not oppose" Route 179R, please explain why.
N/a

Response:

Watkins RFI No. 1-2. In the Direct Testimony of T. Brian Almon (Docket Item No. 1426), Mr. Almon identified another 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. *Our property would not be directly affected by any of route 179-Watkins.*
- b. Would you support or "not oppose" Route 179-Watkins?
not oppose
- c. If you cannot agree to support or "not oppose" Route 179-Watkins, please explain why. *N/a*

Response:



Filing Receipt

Filing Date - 2023-08-09 04:43:10 PM

Control Number - 55067

Item Number - 1610

PUC DOCKET NO. 55067

SOAH DOCKET NO. 473-23-21216

RONALD AND KATHRINE MOREHEAD

RESPONSE TO EDGAR BRENT WATKINS AND MARY ANN LIVENGOOD'S

FIRST REQUESTS FOR INFORMATION TO RONALD AND KATHRINE MOREHEAD

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: AO-A4-BI-B61B62-CI-C21-C23-C7-E2-EI-E6-GI-G3-H41-H42-H8-I8-J3-K1-L5-L4-L3-L2-MI-M2M3-R4-V1-V3-V4-Z.

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

- a. The property we own would not be directly affected by any of Route 179-R.
- b. We would not oppose Route 179-R.
- c. N/A

Prepared by: Ronald Morehead

Sponsored by: Ronald Morehead

Watkins RFI No. 1-2. In the Direct Testimony of T. Brian Almon (Docket Item No. 1426), Mr. Almon identified another modified version of Route 179, which was identified as "Route 179 Watkins," consisting of the following combination of Segments: AO-A4-B 1-B61-B62-CI-C21-C23 -C7-E2-IF, 1 -E6-GI -G3 -H41-H42-H8-I8-J3 -KI-L5-L4-L3 -L2-MI-M5-R2-R5-U3 -V3 -V4-Z.

- a. Please confirm that your property is not directly impacted by any of Route 179-Watkins.
- b. Would you support or "not oppose" Route 179-Watkins?
- c. If you cannot agree to support or 11 not oppose" Route 179-Watkins, please explain why.

Response:

- a. The property we own would not be directly affected by any of Route 179-Watkins.
- b. We would not oppose Route 179-Watkins.
- c. N/A

Prepared by: Ronald Morehead

Sponsored by: Ronald Morehead



Filing Receipt

Filing Date - 2023-08-10 05:04:19 PM

Control Number - 55067

Item Number - 1622

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

**APPLICATION OF ONCOR ELECTRIC
§
DELIVERY COMPANY LLC TO AMEND**

§ ITS CERTIFICATE OF CONVENIENCE § WISE COUNTIES

**§
AND NECESSITY FOR THE RAMHORN**

**§
HILL – DUNHAM 345 KV §
BEFORE THE STATE OFFICE OF**

ADMINISTRATIVE HEARINGS

**§
TRANSMISSION LINE IN DENTON AND**

**EDGAR BRENT WATKINS AND MARY ANN LIVENGOOD’S FIRST SET OF
REQUESTS FOR INFORMATION TO JOHN RODDAM**

Pursuant to PUC Procedural Rule 22.141 and 22.144, Intervenors Edgar Brent Watkins and Mary Ann Livengood (“Watkins”) request that John Roddam (“Roddam”) provide responses to the following Requests for Information (“RFI” or “RFIs”).

Please answer the attached questions in accordance with the procedural schedule and orders issued in this case, the Commission’s Procedural Rules, the Texas Rules of Civil Procedure, and other applicable law. Please copy the question immediately above the answer to each question. Please state the name of the witness or witnesses in this case who will sponsor the answer to the question at the hearing

and can vouch for the truth of the answer. The answer should be filed under oath, or the response should stipulate in writing that the answer can be treated by all parties as if filed under oath.

The questions should be answered in sufficient detail to fully present all of the relevant facts. In answering this request, Roddam is requested to furnish such information as is available to Roddam, including information Roddam is able to obtain

Edgar Brent Watkins and Mary Ann Livengood's First Request for Information to
John Roddam Page 1 of 9 Docket No. 55067

by due diligence from Roddam's present or former attorneys, accountants, investigators, consultants, employees, agents, and persons acting on Roddam's behalf.

If the items requested to be produced herein have already been provided in other discovery answers to any party, it shall not be necessary to duplicate such production. It shall be sufficient that the answer containing the requested information is clearly identified. Where only a portion of the requested information has been previously provided, this shall be disclosed and all information necessary to fully and completely answer this discovery request shall be provided in your answer. If there is a relevant change in Roddam's answer after it is submitted such that it is no longer complete or accurate, please submit an amended answer, under oath, as a supplement to the original answer within five (5) working days of Roddam's discovery of the need for such amendment.

Please provide Roddam's response to the undersigned counsel:

Tyler Topper

Texas Bar No. 24059263
ttopper@mw-law.com
Christian Stewart
Texas Bar No. 24013569
cstewart@mw-law.com
MORGAN WILLIAMSON LLP
701 South Taylor, Suite 440
Amarillo, Texas 79101
Telephone: (806) 358-8116
Facsimile: (806) 350-7642

Edgar Brent Watkins and Mary Ann Livengood's First Request for Information to
John Roddam Page 2 of 9 Docket No. 55067

DEFINITIONS

1. "Roddam" refers to John Roddam, and any person acting or purporting to act on their behalf, including without limitation, attorneys, agents, advisors, investigators, representatives, employees, or other persons.

2. "You" and "your" refers to the party to which the RFI is directed. 3.

"Application" means the Application by Oncor Electric Delivery Company, LLC to Amend its Certificate of Convenience and Necessity for a Transmission Line in Denton and Wise Counties.

4. "Communication" means any oral, written, or electronic statements, representations, discussions, conversations, speeches, meetings, remarks, questions, answers, panel discussions, or symposium of which Roddam has knowledge, information or belief.

5. "Concerning" means, in whole or in part, directly or indirectly, referring to,

relating to, being connected with, commenting on, responding to, showing, describing, analyzing, reflecting embodying, mentioning, or constituting the subject matter identified in the request.

6. "Date" means the exact day, month, and year, if ascertainable or, if not, the best approximation.

7. "Describe" or "identify" when used in reference to a document, means you must state, to the fullest extent possible, the following:

a. The nature (e.g. letter, handwritten note) of the document;

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b. The title or heading that appears on the document;

c. The date of the document and the date of each addendum,
supplement, or other addition or change;

d. The identity of the author of the document; any signatory or
signatories of the document; and the person on whose behalf or
at whose request or direction the document was prepared or
delivered; and

e. The present location of the document, and the name, address,
position or title, and telephone number(s) of the person(s)
having custody of the document.

8. The terms "document" or "documents" are used in their broadest sense to include, but not be limited to, all written or graphic matter of every kind and

description whether printed, produced, or reproduced, by any process whether visually, magnetically, mechanically, electronically, or by hand, whether final or draft, original or reproduction whether privileged or otherwise excludable from discovery, and whether or not in your actually or constructive possession, custody or control. These shall also be construed to include every copy of a document where there copy contains any commentary or notation of any kinds that does not appear on the original or any other copy.

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9. The words "segment" or "segments" reference the individually numbered/lettered portions of the preferred and alternative routes described in the Application.

10. Words used in the plural shall also be taken to mean and to include the singular. Words used in the singular shall also be taken to mean and include the plural.

11. The present tense shall be construed to include the past tense, and the past tense shall be construed to include the present tense.

12. "Each" shall be construed to include the word "every" and "every" shall be construed to include the word "each".

13. The term "including" means "including, but not limited to". 14. Oncor's

“Route 179” consists 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-V2-Z.

15. T. Brian Almon’s “Route 179R” consists 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.

16. T. Brian Almon’s “Route 179-Watkins” consists 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.

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INSTRUCTIONS

1. As to any request for information to which you are unable to respond to in whole or in part for any reason, please state the grounds for inability respond. When you believe that a complete answer to a particular request for information or part thereof is not possible, please answer each request for information to the extent possible and furnish a statement explaining: (a) the reason for your inability to respond further; and (b) whatever information or knowledge you have concerning the non-responsive portion.

2. For each document or other requested information that you assert is privileged, please comply with the requirements of Rule 193.3 of the Texas Rules of

Civil Procedure and P.U.C. Proc. R. 22.144.

3. For every document that no longer exists or cannot be located; identify the document; state how and when the document passed out of existence, or when it could no longer be located; and state the reason(s) for the disappearance; identify each person having knowledge about the disposition or loss of the document; and identify each document evidencing the existence or nonexistence of each document that cannot be located.

4. It is requested that all documents that might impact on the subject matter of the Application be preserved and that any ongoing process of document destruction involving such documents cease.

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5. Furnish all requested documents available to you and known by you, or in your possession, custody, or control or that of your agents and attorneys. 6. In those instances where you choose to answer a request for information by referring to a specific document or record, it is requested that the specification be in sufficient detail to permit the requestor to locate and identify the record(s) and/or document(s) from which the answer is to be ascertained, as readily as you can. 7. In those instances when requested information or documents are stored only on software, computer based information, or other data compilations, you should either produce the raw data along with all codes and programs for translating it into usable

form, or produce the information or documents in a finished usable form that includes all necessary glossaries, keys, indices for interpretation of the material. 8. Please respond to each request for information and indicate clearly the request for information to which each response is responsive. When requests for information contain subparts, indicate in your answer the subpart to which each particular part of your response is in response.

9. You are under a duty to supplement your responses to these requests for information that are incomplete or incorrect when made. Furthermore, you are under a duty to timely supplement and/or amend your responses if you receive, obtain, or generate information within the scope of any request for information between the time of the original responses and the conclusion of this proceeding.

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10. Unless otherwise indicated, the discovery requested in these requests is for information related to the time period from June, 2018 through and including the present. All requested documents, data compilations, and recordings whenever actually prepared or generated that related to this time period are to be produced.

Respectfully submitted,

MORGAN WILLIAMSON, LLP
701 South Taylor, Suite 440
Amarillo, Texas 79101
Telephone: (806) 358-8116
Facsimile: (806) 350-7642

A handwritten signature in black ink, appearing to be "Morgan Williamson", written over a horizontal line.

By: _____

Tyler Topper

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Christian Stewart

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cstewart@mw-law.com

**ATTORNEYS FOR EDGAR BRENT
WATKINS AND MARY ANN LIVENGOOD**

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.



Tyler Topper

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**EDGAR BRENT WATKINS AND MARY ANN LIVENGOOD'S FIRST SET OF
REQUESTS FOR INFORMATION TO JOHN RODDAM**

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.