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: My property would not be directly impacted by route 179R

I would not oppose route 179R

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: My property would not be directly impacted by route 179-Watkins

I would not oppose route 179-Watkins

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

Filing Receipt

Filing Date - 2023-08-07 02:03:48 PM

Control Number - 55067

Item Number - 1581

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**

EDGAR BRENT WATKINS AND MARY ANN LIVENGOOD'S FIRST SET OF REQUESTS FOR INFORMATION TO CRAIG C. LAPLANT

Pursuant to PUC Procedural Rule 22.141 and 22.144, Intervenors Edgar Brent Watkins and Mary Ann Livengood ("Watkins") request that Craig C. LaPlant ("LaPlant") 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, LaPlant is requested to furnish such

information as is available to LaPlant, including information LaPlant is able to obtain by due diligence from LaPlant's present or former attorneys, accountants, investigators, consultants, employees, agents, and persons acting on LaPlant'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 LaPlant'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 LaPlant's discovery of the need for such amendment.

Please provide LaPlant'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. "LaPlant" refers to Craig C. LaPlant, 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 LaPlant 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 CRAIG C. LAPLANT

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 of Route 179R

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

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?
We would not oppose Route 179-Watkins

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

Response:

Craig C. LaPlant *August 7, 2023*

Filing Receipt

Filing Date - 2023-08-10 07:48:45 PM

Control Number - 55067

Item Number - 1623

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

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

Pursuant to PUC Procedural Rule 22.141 and 22.144, Intervenors Edgar Brent Watkins and Mary Ann Livengood ("Watkins") request that Crystal Boyd ("Boyd") 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, Boyd is requested to furnish such information as is available to Boyd, including information Boyd is able to obtain by

due diligence from Boyd's present or former attorneys, accountants, investigators, consultants, employees, agents, and persons acting on Boyd'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 Boyd'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 Boyd's discovery of the need for such amendment.

Please provide Boyd'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. "Boyd" refers to Crystal Boyd, 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 Boyd 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 CRYSTAL BOYD

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.
   Correct, my property is not directly impacted by Route 179

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

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.
   Correct, my property is not directly impacted by Route 179

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

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

Response:

Filing Receipt

Filing Date - 2023-08-11 02:07:35 PM

Control Number - 55067

Item Number - 1635

From: Scott Brooks <Scott@midcitieserectors.com>
Sent: Friday, August 11, 2023 10:16 AM
To: Katryce Johnson <KJohnson@mw-law.com>
Subject: Re: Docket 55067 - Watkins First RFIs to Jeffery Scott Brooks

This is Scott Brooks

In response to T. Brian Almons Route 179R route.

1. This route does not affect my property.
2. I would support this route.
3. na

In response to T. Brian Almons route 179 - Watkins route.

1. This route does not directly impact my property.
2. I would support this route.
3. na

Scott Brooks

Filing Receipt

Filing Date - 2023-08-11 05:19:02 PM

Control Number - 55067

Item Number - 1638

EDGAR BRENT WATKINS AND MARY ANN LIVENGOOD'S FIRST SET OF REQUESTS FOR INFORMATION TO HARVEY AND CYNTHIA REEVES

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. Reeves' property is not impacted by Route 179R

b. Would you support or "not oppose" Route 179R? We do not oppose route 179R

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. Reeves' property is not affected by Rote 179-Watkins

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

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

Filing Receipt

Filing Date - 2023-08-12 09:01:18 AM

Control Number - 55067

Item Number - 1642

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**
	§	

RAYMOND LOUSTAUNAU'S RESPONSE TO EDGAR BRENT WATKINS AND MARY ANN LIVENGOOD'S FIRST SET OF REOUESTS 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, Raymond Loustaunau 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,

Raymond Loustaunau
481 County Road 4840
Haslet, TX 76052
817-797-5111
raym2458@gmail.com

RAYMOND LOUSTAUNAU'S RESPONSE TO EDGAR BRENT WATKINS AND MARY ANN LIVENGOOD'S FIRST SET OF REOUESTS FOR INFORMATION
SOAH DOCKET NO. 473-23-21216
PUC DOCKET NO. 55067

CERTIFICATE OF SERVICE

I hereby certify that on August 10, 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.

Raymond Loustaunau

EDGAR BRENT WATKINS AND MARY ANN LIVENGOOD'S FIRST SET OF REOUESTS FOR INFORMATION TO RAYMOND LOUSTAUNAU

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 - 2023-08-08 03:05:22 PM

Control Number - 55067

Item Number - 1585

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**

GRBK EDGEWOOD LLC AND GBTM SENDERA LLC'S RESPONSE TO EDGAR BRENT WATKINS AND MARY ANN LIVENGOOD'S FIRST REQUEST FOR INFORMATION

GRBK Edgewood LLC and GBTM Sendera LLC ("*GRBK and GBTM*") file this Response to the First Request for Information ("*RFI*") from Edgar Brent Watkins and Mary Ann Livengood ("*Watkins*"). Watkins served their RFIs on GRBK and GBTM on August 3, 2023 at 3:55 p.m. Pursuant to the discovery plan outlined in SOAH Order No. 2 issued in this docket on June 27, 2023, the deadline for GRBK and GBTM to respond to Watkins' First RFIs is August 11, 2023.[1] Therefore, these responses are timely filed. GRBK and GBTM agree and stipulates that all parties may treat these responses as if the answers were filed under oath.

GRBK and GBTM file these responses 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 produced 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 a Protective Order entered in this docket.

[1] Pursuant to 16 Tex. Admin. Code § 22.144(b)(2), "[r]equests for information that are received after 3:00 p.m. shall be deemed to have been received the following business day." The discovery plan outlined in SOAH Order No. 2 established a deadline of five working days for responses to discovery requests regarding Intervenor direct and cross-rebuttal testimony.

Respectfully submitted,

/s/ Hilary Liston

Hilary Liston, Esq.
State Bar No. 00791786
General Counsel – Real Estate
Green Brick Partners, Inc.
2805 Dallas Parkway, Suite 400
Plano, Texas 75093
(469) 573-6721
hliston@greenbrickpartners.com

ATTORNEY FOR GRBK EDGEWOOD LLC AND GBTM SENDERA LLC

CERTIFICATE OF SERVICE

I certify that a copy of this document was served on all parties of record on this date via the Commission's Interchange in accordance with the Commission' s Second Order in Docket No. 50664 suspending PUC Procedural Rule 22.74.

/s/ Hilary Liston

Hilary Liston, Esq.

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**

GRBK EDGEWOOD LLC AND GBTM SENDERA LLC'S RESPONSE TO EDGAR BRENT WATKINS AND MARY ANN LIVENGOOD'S FIRST REQUEST FOR INFORMATION

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 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 No. 1-1:

a. Confirmed.

b. Support.

c. Not applicable.

Prepared by: Hilary Liston — Title: General Counsel-Real Estate, Green Brick Partners, Inc.

Sponsored by: Bobby Samuel — Title: National Vice President of Land, Green BrickPartners, Inc.; Vice President, GRBK Edgewood LLC; and Management Committee representative, GBTM Sendera LLC

Filing Receipt

Filing Date - 2023-08-11 05:19:33 PM

Control Number - 55067

Item Number - 1639

Pamela & James Matthews
12701 Helen Rd
Justin, TX 76247

EDGAR BRENT WATKINS AND MARY ANN LIVENGOOD'S FIRST SET OF REQUESTS FOR INFORMATION TO JAMES AND PAMELA MATTHEWS

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 of Route 179R

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

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.

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:

Pamela + James Matthews 8/10/2023

Filing Receipt

Filing Date - 2023-08-11 05:20:52 PM

Control Number - 55067

Item Number - 1640

Wyatt Matthews
12701 Helen Rd
Justin, TX 76247

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

Watkins RFI No. 1-1. In the Direct Testimony of T. Brian Almon (Docket Item No. 1426), Mr. Almon identified a modified version of Route 179, which was identified as "Route 179R," consisting of the following combination of Segments: A0-A4-B1-B61-B62-C1-C21-C23-C7-E2-E1-E6-G1-G3-H41-H42-H8-I8-J3-K1-L5-L4-L3-L2-M1-M2-M3-R4-V1-V3-V4-Z.

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

Response: My property is not directly affected by any of Route 179R.

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

Response: I would not oppose Route 179R.

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.

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:

Wyatt Matthews 8/10/23

Filing Receipt

Filing Date - 2023-08-11 05:21:26 PM

Control Number - 55067

Item Number - 1641

Brenna Matthews
12701 Helen Rd
Justin, TX 76247

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

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. My property would not be directly affected by any of Route 179R.

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

I would not oppose Route 179R

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.

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:

Brenna Matthews 8/23/2023

Filing Receipt

Filing Date - 2023-08-07 12:29:52 AM

Control Number - 55067

Item Number - 1577

JAMES AND HOLLY LEWIS'S RESPONSE TO EDGAR BRENT WATKINS AND MARY ANN LIVENGOOD'S FIRST SET OF REQUESTS FOR INFORMATION
SOAH DOCKET NO. 473-2321216
PUC DOCKET NO. 55067

EDGAR BRENT WATKINS AND MARY ANN LIVENGOOD'S FIRST SET OF REQUESTS FOR INFORMATION TO JAMES AND HOLLY LEWIS

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. To the extent "directly impacted" is given the same definition as "directly affected" as described in Public Utility Commission Procedural Rule 22.52(a)(3), our property is directly impacted by Route 179R. However, if the definition of "directly impacted" is given a different definition, then the definition of "directly impacted" will need to be provided in order to respond completely.
b. We oppose Route 179R.
c. Route 179R contains segment J3 which directly impacts our 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:

a. To the extent "directly impacted" is given the same definition as "directly affected" as described in Public Utility Commission Procedural Rule 22.52(a)(3), our

property is directly impacted by Route 179-Watkins. However, if the definition of "directly impacted" is given a different definition, then the definition of "directly impacted" will need to be provided in order to respond completely.

b. We oppose Route 179-Watkins.
c. Route 179-Watkins contains segment J3 which directly impacts our property.

CERTIFICATE OF SERVICE

We hereby certify that on August 7, 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. The responses to these requests may be treated as though provided under oath. Additionally, email copies will be forwarded to the representative attorneys.

James and Holly Lewis

1117 Denton Creek Drive

Justin, TX 76247

Jhlewis22@verizon.net

Filing Receipt

Filing Date - 2023-08-10 11:15:38 PM

Control Number - 55067

Item Number - 1626

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

JUSTIN TOWN CENTER, LTD'S RESPONSE TO EDGAR BRENT WATKINS AND MARY ANN LIVENGOOD'S FIRST SET OF REQUESTS FOR INFORMATION

Justin Town Center, LTD. ("JTC") files this Response to Edgar Brent Watkins and Mary Ann Livengood ("Watkins") First Request for Information to JTC. JTC'S response to request for information shall be made within five (5) working days making the response due by August 10, 2023. This response is therefore timely. All parties may treat the answers as if they were filed under oath.

JTC files these responses in the spirit of cooperation without agreeing to the relevancy of the information sought and without waiving their right to object at the time of the hearing to the admissibility of information produced herein.

Respectfully submitted,

Justin Town Center, LTD.
SOUTHLAKE, TX 76092
Telephone: (817) 416-3981

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

CERTIFICATE OF SERVICE

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

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

EDGAR BRENT WATKINS AND MARY ANN LIVENGOOD'S FIRST SET OF REQUESTS FOR INFORMATION TO JUSTIN TOWN CENTER, LTD.

Watkins – JTC RFI No. 1-1:

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

Response:

I confirm that Route 179R does not cross property of JTC.
Sponsor: Peter J. Wangoe II

Watkins – JTC RFI No. 1-1:

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

Response:

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

Watkins - JTC RFI No. 1-2:

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

Response:
I confirm that Route 179-Watkins does not cross property of JTC.
Sponsor: Peter J. Wangoe II

Watkins - JTC RFI No. 1-2:

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

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

Response:

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

Filing Receipt

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

Control Number - 55067

Item Number - 1627

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

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**

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

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

JTS files these responses in the spirit of cooperation without agreeing to the relevancy of the information sought and without waiving their right to object at the time of the hearing to the admissibility of information produced herein.

Respectfully submitted,

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

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

CERTIFICATE OF SERVICE

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

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

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

Watkins – JTS RFI No. 1-1:

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

Response:

I confirm that Route 179R does not cross property of JTS.
Sponsor: Peter J. Wangoe II

Watkins – JTS RFI No. 1-1:

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

Response:

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

Watkins - JTS RFI No. 1-2:

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

Response:
I confirm that Route 179-Watkins does not cross property of JTS.
Sponsor: Peter J. Wangoe II

Watkins - JTS RFI No. 1-2:

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

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

Response:

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

Filing Receipt

Filing Date - 2023-08-10 09:11:03 PM

Control Number - 55067

Item Number - 1625

Filing Receipt

Filing Date - 2023-08-03 02:25:06 PM

Control Number - 55067

Item Number - 1544

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**

EDGAR BRENT WATKINS AND MARY ANN LIVENGOOD'S FIRST SET OF REQUESTS FOR INFORMATION TO GREG AND MALLORY MABERRY

Pursuant to PUC Procedural Rule 22.141 and 22.144, Intervenors Edgar Brent Watkins and Mary Ann Livengood ("Watkins") request that Greg and Mallory Maberry ("Maberry") 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, Maberry is requested to furnish such

information as is available to Maberry, including information Maberry is able to obtain by due diligence from Maberry's present or former attorneys, accountants, investigators, consultants, employees, agents, and persons acting on Maberry'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 Maberry'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 Maberry's discovery of the need for such amendment.

Please provide Maberry'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. "Maberry" refers to Greg and Mallory Maberry, 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 Maberry 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 GREG AND MALLORY MABERRY

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. My property is not directly affected by Route-179R
B. I would not support Route 179R
C. Sections K1, L5, and L4 are still too close for my preference.

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. My property is not directly affected by Route-179R
B. I would not support Route 179R
C. Sections K1, L5, and L4 are still too close for my preference.

Filing Receipt

Filing Date - 2023-08-10 11:49:19 PM

Control Number - 55067

Item Number - 1630

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**

SARA YARBROUGH'S RESPONSE TO EDGAR BRENT WATKINS AND MARY ANN LIVENGOOD'S FIRST SET OF REQUESTS FOR INFORMATION

Pursuant to the Orders in this Docket, PUC Procedural Rule 22.144, and other applicable Commission rules, Sara Yarbrough hereby serves her 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,

Sara Yarbrough
344 Cedar Crest Drive
Justin, Texas 76247
skyarbrough626@gmail.com

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. **My property would not be directly impacted by the Route of 179R, but I do believe my property would be directly affected by the Route of 179R.**
b. **I would not support Route 179R.**
c. **I would not support Route 179R because of the following segments: H8, I8, and J3. Justin is a small town in regards to square footage. I believe that any high voltage power lines that run through or close to the city will have a negative impact on property values. I also believe that these lines will interfere with the City of Justin's plans to connect all the parks and areas of the city via sidewalks and walkways.**

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. My property would not be directly impacted by the Route of 179R, but I do believe my property would be directly affected by the Route of 179R.

b. I would not support Route 179R.

c. I would not support Route 179R because of the following segments: H8, I8, and J3. Justin is a small town in regards to square footage. I believe that any high voltage power lines that run through or close to the city will have a negative impact on property values. I also believe that these lines will interfere with the City of Justin's plans to connect all the parks and areas of the city via sidewalks and walkways.

CERTIFICATE OF SERVICE

I hereby certify that on August 10, 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.

Sara Yarbrough

Filing Receipt

Filing Date - 2023-08-11 04:42:37 PM

Control Number - 55067

Item Number - 1637

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**

ALAN YARBROUGH'S RESPONSE TO EDGAR BRENT WATKINS AND MARY ANN LIVENGOOD'S FIRST SET OF REQUESTS FOR INFORMATION

Pursuant to the Orders in this Docket, PUC Procedural Rule 22.144, and other applicable Commission rules, Alan Yarbrough 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,

Alan Yarbrough
344 Cedar Crest Drive
Justin, Texas 76247
alanymusic@gmail.com

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. My property would not be directly impacted by the Route of 179R, but I do believe my property would be directly affected by the Route of 179R.

b. I would not support Route 179R.

c. I would not support Route 179R because of the following segments: H8, I8, and J3. Justin is a small town in regards to square footage. I believe that any high voltage power lines that run through or close to the city will have a negative impact on property values and quality of life for the residents of Justin, TX. I also believe that these lines will interfere with the City of Justin's plans to connect all the parks and areas of the city via sidewalks and walkways.

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. **My property would not be directly impacted by the Route of 179R, but I do believe my property would be directly affected by the Route of 179R.**
b. **I would not support Route 179R.**
c. **I would not support Route 179R because of the following segments: H8, I8, and J3. Justin is a small town in regards to square footage. I believe that any high voltage power lines that run through or close to the city will have a negative impact on property values and the quality of life for the residents of Justin, TX. I also believe that these lines will interfere with the City of Justin's plans to connect all the parks and areas of the city via sidewalks and walkways.**

CERTIFICATE OF SERVICE

I hereby certify that on August 11,2023, 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.

Alan Yarbrough

Filing Receipt

Filing Date - 2023-08-10 11:21:52 PM

Control Number - 55067

Item Number - 1628

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**

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

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

SIGNED this 10th day of August, 2023

By: *<u>/s/ Timothy Simmons</u>*
Timothy simmons
322 Hardeman Blvd
Justin, TX 76247
Phone No. 940-368-2029
Timsimmons.gcb@gmail.com

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

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

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

Watkins RFI No. 1-1. In the Direct Testimony of T. Brian Almon (Docket Item No. 1426), Mr. Almon identified a modified version of route 179, which was identified as "route 179R," consisting of the following combination of Segments: A0-A4-B1-B61-B62-C1-C21-C23-C7-E2-E1-E6-G1-G3-H41-H42-H8-I8-J3-K1-L5-L4-L3-L2-M1-M2-M3-R4-V1-V3-V4-Z.

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

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

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

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

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

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

Watkins RFI No. 1-2. In the Direct Testimony of T. Brian Almon (Docket Item No. 1426), Mr. Almon identified a modified version of route 179, which was identified as "route 179-Watkins," consisting of the following combination of Segments: A0-A4-B1-B61-B62-C1-C21-C23-C7-E2-E1-E6-G1-G3-H41-H42-H8-I8-J3-K1-L5-L4-L3-L2-M1-M5-R2-R5-U3-V3-V4-Z.

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

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

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

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

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

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

Filing Receipt

Filing Date - 2023-08-10 11:23:07 PM

Control Number - 55067

Item Number - 1629

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**

ANA SIMMONS RESPONSE TO EDGAR BRENT WATKINS AND MARY ANN LIVENGOOD'S FIRST SET OF REQUESTS FOR INFORMATION

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

SIGNED this 10th day of August, 2023

By: *<u>/s/ Ana Simmons</u>*
Ana simmons
322 Hardeman Blvd
Justin, TX 76247
Phone No. 817-371-7339
ana@anasimmons.com

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

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

ANA SIMMONS RESPONSE TO EDGAR BRENT WATKINS AND MARY ANN LIVENGOOD'S FIRST SET OF REQUESTS FOR INFORMATION

Watkins RFI No. 1-1. In the Direct Testimony of T. Brian Almon (Docket Item No. 1426), Mr. Almon identified a modified version of route 179, which was identified as "route 179R," consisting of the following combination of Segments: A0-A4-B1-B61-B62-C1-C21-C23-C7-E2-E1-E6-G1-G3-H41-H42-H8-I8-J3-K1-L5-L4-L3-L2-M1-M2-M3-R4-V1-V3-V4-Z.

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

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

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

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

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

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

Watkins RFI No. 1-2. In the Direct Testimony of T. Brian Almon (Docket Item No. 1426), Mr. Almon identified a modified version of route 179, which was identified as "route 179-Watkins," consisting of the following combination of Segments: A0-A4-B1-B61-B62-C1-C21-C23-C7-E2-E1-E6-G1-G3-H41-H42-H8-I8-J3-K1-L5-L4-L3-L2-M1-M5-R2-R5-U3-V3-V4-Z.

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

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

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

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

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

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

Filing Receipt

Filing Date - 2023-08-09 03:52:00 PM

Control Number - 55067

Item Number - 1607

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

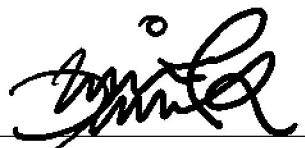
APPLICATION OF ONCOR ELECTRIC	**§**	**BEFORE THE STATE OFFICE**
DELIVERY COMPANY LLC TO AMEND	**§**	
ITS CERTIFICATE OF CONVENIENCE	**§**	
AND NECESSITY FOR THE RAMHORN	**§**	**OF**
HILL – DUNHAM 345 KV	**§**	
TRANSMISSION LINE IN DENTON AND	**§**	
WISE COUNTIES	**§**	**ADMINISTRATIVE HEARINGS**

DANIEL DENNIS' 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 Stewart, Morgan & Williamson, LLP, 701 South Taylor, Suite 440, Amarillo, Texas 79101

Pursuant to the Orders in this Docket, PUC Procedural Rule 22.144, and other applicable Commission rules, Daniel Dennis 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,



Daniel Dennis

215 Cedar Crest Dr,
Justin, TX 76247
817-917-4853
inspiregreatnesschangelives@gmail.com

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. To the extent "directly impacted" is given the same specific definition as "directly affected" as described in PUC Procedural Rule 22.52(a)(3), I can confirm my property would not be directly impacted by any of Route 179R. However, if the definition of "directly impacted" is given a definition to include effects that are directly tied to the construction of these lines, then I cannot confirm my property is not directly impacted by any of Route 179R.

b. I would not support Route 179R.

c. I cannot support Route 179R, because it consists of the following Segments: J3, I8 and H8, that still go through and/or run adjacent to the City of Justin and will be between 4,300-4,400 ft from my property. Justin is a small town and these lines will be a huge detractor to the aesthetics of this city, and will negatively affect property values in the area. Route 164 seems to be the most logical route with the least impact on habitable structures within 500 feet of the line. I would support a modified version of Route 164 or any other route, to include a modification of Route 179, that doesn't include the afore-mentioned Segments.

Sponsoring Witness: Daniel Dennis

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. To the extent "directly impacted" is given the same specific definition as "directly affected" as described in PUC Procedural Rule 22.52(a)(3), I can confirm my property would not be directly impacted by any of Route 179-Watkins. However, if the definition of "directly impacted" is given a definition to include effects that are directly tied to the construction of these lines, then I cannot confirm my property is not directly impacted by any of Route 179-Watkins.

b. I would not support Route 179-Watkins.

c. I cannot support Route 179-Watkins, because it consists of the following Segments: J3, I8 and H8, that still go through and/or run adjacent to the City of Justin and will be between 4,300-4,400 ft from my property. Justin is a small town and these lines will be a huge detractor to the aesthetics of this city, and will negatively affect property values in the area. Route 164 seems to be the most logical route with the least impact on habitable structures within 500 feet of the line. I would support a modified version of Route 164 or any other route, to include a modification of Route 179, that doesn't include the afore-mentioned Segments.

Sponsoring Witness: Daniel Dennis

CERTIFICATE OF SERVICE

I hereby certify that on August 9, 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.

Daniel Dennis

Filing Receipt

Filing Date - 2023-08-10 01:19:03 AM

Control Number - 55067

Item Number - 1615

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**

MELISSA DENNIS' 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 Stewart, Morgan & Williamson, LLP, 701 South Taylor, Suite 440, Amarillo, Texas 79101

Pursuant to the Orders in this Docket, PUC Procedural Rule 22.144, and other applicable Commission rules, Melissa Dennis hereby serves her 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,

Melissa Dennis

215 Cedar Crest Dr,
Justin, TX 76247
817-917-4893
melissadennisrealestate@gmail.com

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. To the extent "directly impacted" is given the same specific definition as "directly affected" as described in PUC Procedural Rule 22.52(a)(3), I can confirm my property would not be directly impacted by any of Route 179R. However, if the definition of "directly impacted" is given a definition to include effects that are directly tied to the construction of these lines, then I cannot confirm my property is not directly impacted by any of Route 179R.

b. I would not support Route 179R.

c. I cannot support Route 179R, because it consists of the following Segments: J3, I8 and H8 that still go through and/or run adjacent to the City of Justin and will be between 4,300-4,400 ft from my property. Justin is a small town and these lines will be a huge detractor to the aesthetics of this city, and will negatively affect property values in the area. Route 164 seems to be the most logical route with the least impact on habitable structures within 500 feet of the line. I would support a modified version of Route 164 or any other route, to include a modification of Route 179, that doesn't include the afore-mentioned Segments.

Sponsoring Witness: Melissa Dennis

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. To the extent "directly impacted" is given the same specific definition as "directly affected" as described in PUC Procedural Rule 22.52(a)(3), I can confirm my property would not be directly impacted by any of Route 179-Watkins. However, if the definition of "directly impacted" is given a definition to include effects that are directly tied to the construction of these lines, then I cannot confirm my property is not directly impacted by any of Route 179-Watkins.

b. I would not support Route 179-Watkins.

c. I cannot support Route 179-Watkins, because it consists of the following Segments: J3, I8 and H8 that still go through and/or run adjacent to the City of Justin and will be between 4,300-4,400 ft from my property. Justin is a small town and these lines will be a huge detractor to the aesthetics of this city, and will negatively affect property values in the area. Route 164 seems to be the most logical route with the least impact on habitable structures within 500 feet of the line. I would support a modified version of Route 164 or any other route, to include a modification of Route 179, that doesn't include the aforementioned Segments.

Sponsoring Witness: Melissa Dennis

CERTIFICATE OF SERVICE

I hereby certify that on August 10, 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.

Melissa Dennis

Filing Receipt

Filing Date - 2023-08-11 03:19:35 PM

Control Number - 55067

Item Number - 1636

EDGAR BRENT WATKINS AND MARY ANN LIVENGOOD'S FIRST SET OF REQUESTS FOR INFORMATION TO VESTED ROCK VENTURES, LTD.

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. Route 179R does not impact my property.

b. No.

c. NA

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. Route 197-Watkins does not impact my property.

b. No.

c. NA

Responses by Gage Harris on behalf of Vested Rock Ventures Ltd.
August 11, 2023

EXHIBIT “B”

JOINT RESOLUTION

Filing Receipt

Filing Date - 2023-08-09 04:51:29 PM

Control Number - 55067

Item Number - 1611

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**

CITY OF RHOME'S RESPONSE TO EDGAR BRENT WATKINS AND MARY ANN LIVENGOOD'S FIRST SET OF REQUESTS FOR INFORMATION

COMES NOW the City of Rhome ("Rhome") to file its RESPONSE TO EDGAR BRENT WATKINS AND MARY ANN LIVENGOOD'S FIRST SET OF REQUESTS FOR INFORMATION, and states as follows:

REQUESTS

Watkins RFI No. 1-1. Please provide a complete copy of the fully-executed Joint Resolution passed by the City Council of the City of Justin, Texas, on the 11th day of July, 2023, the City Council of the City of Rhome, Texas, on the 13th day of July, 2023, and the City Council of the City of New Fairview, Texas, on the 17th day of July, 2023, including a complete color copy of Exhibit "A" (and any other attachments) to said Joint Resolution. For reference, an incomplete copy of the Joint Resolution was filed as Item No. 1105 in this docket.

RESPONSE: See attached Exhibit A.

Response prepared by: Shaina Odom, City Secretary, City of Rhome
James Donovan, Attorney for the City of Rhome

Sponsoring Witness: N/A