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SOAH DOCKET NO. 473-15-5258
PUC DOCKET NO. 44837

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APPLICATION OF AEP TEXAS
CENTRAL COMPANY TO AMEND ITS
CERTIFICATE OF CONVENIENCE
AND NECESSITY FOR THE TULETA
TO EULER TO COLETO CREEK
DOUBLE-CIRCUIT 138-KV
TRANSMISSION LINE IN BEE AND
GOLIAD COUNTIES, TEXAS

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BEFORE THE STATE OFFICE
OF
ADMINISTRATIVE HEARINGS

DIRECT TESTIMONY

of

ROBERTA GRANBERRY, INDIVIDUALLY AND ON BEHALF OF CADILLAC
GRACE, LLC, SHANNON RAMSEY, LISA RAMSEY, AND TRACEY BENNETT

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I. INTRODUCTION

Q. Please state your name and address.

A. My name is Roberta R. Granberry. My address is 1022 Brock, Corpus Christi, Texas 78412.

Q. Please describe your background, profession and/or experience.

A. I attended the University of Texas at Austin from 1975 to 1979. I am a real estate agent.

Q. Have you ever participated or testified in another proceeding before the Public Utility Commission of Texas ("PUC")?

A. No.

Q. On whose behalf are you testifying?

A. I am testifying on my own behalf and on behalf Cadillac Grace, LLC., Shannon Ramsey, Lisa Ramsey, and Tracey Bennett.

Q. Please describe your interest in SOAH Docket No. 473-15-5258 and PUC Docket No. 44837.

A. I intervened in this proceeding as a potentially affected landowner. I own property in Goliad County which might be impacted by the transmission line proposed to be built by AEP Texas Central ("AEP") in this docket (the "Property").

Q. Are you familiar with the Property and this area of Goliad County, Texas?

A. Yes.

Q. Briefly describe your ownership history in the affected Property.

A. The Property has been owned by my family for approximately seventy-five (75) years.

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II. PURPOSE OF TESTIMONY

Q. What is the purpose of your testimony?

A. The purpose of my testimony is to: (i) describe my Property; (ii) describe the expected impact of the proposed transmission line on my Property; (iii) voice my opposition against certain links and routes; and (iv) provide information on the route that I prefer.

Q. Is the information contained in your testimony true and correct to the best of your knowledge and belief?

A. Yes, it is.

1 **III. DESCRIPTION OF THE PROPERTY**
2 **AND IMPACT OF THE TRANSMISSION LINE ON THE PROPERTY**

3 **Q. Please describe your Property.**

4 A. Cadillac Grace, LLC owns an approximate 245-acre tract in Goliad County that will be
5 impacted by the proposed transmission line, if any route utilizing Link W is approved by
6 the PUC. This Property has been identified by AEP as Tract 5722, as shown on Exhibit
7 "A" attached to my testimony.

8 **Q. Are there any habitable structures or other improvements on your Property?**

9 A. There are no habitable structures on the Property. However, the Property is improved
10 with hunting blinds, a water well, and fencing.

11 **Q. Please describe your Property's terrain and any ecological features.**

12 A. There is a creek located on the Property.

13 **Q. Please describe the wildlife on your Property.**

14 A. There are deer, turkeys, quail, dove and other wildlife on the Property.

15 **Q. Please describe the Property's current uses and operations.**

16 A. The Property is used for hunting and for raising cattle.

17 **Q. If the transmission line is built on the Property, do you have any concerns about**
18 **AEP having access to the Property?**

19 A. Yes, I have the general concerns of landowners who are required to give third parties
20 access to their property. More specifically, I am concerned about the safety of extra
21 people on the Property because it is used for hunting. I am also concerned about the
22 potential of gates being left open and cattle escaping. I hope that AEP will respect my
23 Property if I am required to give them access.

24 **Q. If the transmission line is built on the Property, do you have any other concerns?**

25 A. I am concerned about the health and safety issues associated with transmission lines. I am
26 also concerned about devaluation to my Property as a result of this proposed line.
27

1 IV. CONCLUSIONS AND RECOMMENDATIONS

2 Q. Please summarize your position in this proceeding regarding AEP's proposed
3 alternative routes.

4 A. I am very opposed to Links W, Z, LL, PPP, NN, SS, RR and UU, and any of AEP's
5 alternative routes that utilize the same, including Routes EC 1, EC 2, EC 3, EC 4, EC 14,
6 EC 15 and EC 18. I support Routes EC 8 and EC 7.

7 Q. In particular, why do you support Route EC 8?

8 A. Based on my review of AEP's proposed routes, Route EC 8 would avoid my Property
9 and parallel existing ROW (excluding pipeline ROW) and apparent property boundaries
10 for more distance than all but one other route (Route EC 10). Route EC 8 would also
11 affect a smaller number of habitable structures (6) than most of the alternative routes and
12 a smaller number of newly affected habitable structures (4) than most of the alternative
13 routes. Also, Route EC 8's estimated total cost is significantly cheaper than Routes EC 1,
14 EC 2, EC 3, EC 4, EC 14 and EC 18. Route EC 8's estimated total cost is only
15 approximately \$355,000.00 more than route EC 15.
16

17 Although Route EC 8 technically has a portion of ROW crossing through the Refugio-
18 Goliad Conservation Area (the "RGCA"), according to the *Conservation Action Plan for*
19 *the Refugio-Goliad Prairie Conservation Area* published by The Nature Conservancy
20 (one of the primary partners in the RGCA project), the boundaries of the conservation
21 area describe "the general extent of this prairie ecosystem; it [the boundary] is not a hard-
22 and-fast project boundary and may not wholly delineate the area within which the
23 Conservancy and its partners work." The publication also states that the total area within
24 the boundaries of the RGCA is 663,662 acres. I agree with this statement by The Nature
25 Conservancy that the boundaries of the massive RGCA (i.e, the boundaries of the coastal
26 prairie ecosystem a/k/a the Vertisol Coastal Prairie) are not hard-and-fast and point out
27 that the entire city of Refugio and a portion of the city of Goliad are contained within the
28 RGCA boundaries. I do not believe that many areas within the city limits of Refugio and
29 Goliad (e.g., downtown areas, subdivisions, commercially developed areas, etc.) are areas
30 that contribute to the conservation of the Vertisol Coastal Prairie. Likewise, I believe that
31 the areas of the RGCA that are affected by Route EC 8 are primarily, if not entirely, areas

1 either along the boundary of the RGCA (which is not hard-and-fast) or along partially
2 wooded/scrub areas that are not truly Vertisol Coastal Prairie and do not significantly
3 contribute to the conservation of the Vertisol Coastal Prairie. For these reasons, I believe
4 that Route EC 8 would have an extremely small, if any, impact on the massive area of the
5 RGCA and the Vertisol Coastal Prairie.
6

7 Route EC 8 also avoids crossing through the San Antonio River Valley Rural Historic
8 District (the "District"). The District is registered in the National Register of Historic
9 Places and is important because it is associated with events that have made a significant
10 contribution to the patterns of our history. I believe it is important to our society and
11 culture to preserve our historic places if at all possible.

12 **Q. In particular, why do you support Route EC 7?**

13 **A.** Based on my review of AEP's proposed routes, Route EC 7 would avoid my Property
14 and affect an equal or smaller number of habitable structures (5) than all but three (3)
15 routes. Route EC 7 would also affect an equal or smaller number of newly affected
16 habitable structures (3) than all but one (1) route. Also, Route EC 7's estimated total cost
17 is less than all but four (4) other alternative routes.
18

19 Although Route EC 7 also technically has a portion of ROW crossing through the RGCA
20 and the Vertisol Coastal Prairie, I reiterate my statements above concerning the same and
21 believe that the areas of the RGCA and Vertisol Coastal Prairie that are affected by Route
22 EC 7 are primarily, if not entirely, areas either along the boundary of the RGCA (which is
23 not hard-and-fast) or along partially wooded/scrub areas that are not truly Vertisol
24 Coastal Prairie and do not significantly contribute to the conservation of the Vertisol
25 Coastal Prairie. For these reasons, I believe that Route EC 7 would have an extremely
26 small, if any, impact on the massive area of the RGCA and the Vertisol Coastal Prairie.
27

28 As with Route EC 8, Route EC 7 avoids crossing through the San Antonio River Valley
29 Rural Historic District (the "District"). As I mentioned above, the District is registered in
30 the National Register of Historic Places and is important because it is associated with

1 events that have made a significant contribution to the patterns of our history. I believe it
2 is important to our society and culture to preserve our historic places if at all possible.

3 **Q. Does this conclude your testimony?**

4 **A.** Yes, that concludes my testimony, subject to subsequent correction or rebuttal.

CERTIFICATE OF SERVICE

This is to certify that on the 4th day of December, 2015 a true and correct copy of the preceding document was served upon all parties of record in accordance with SOAH Order No. 2 in this docket.

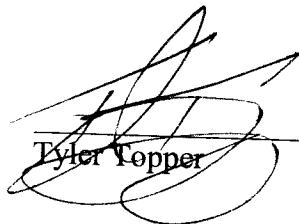

Tyler Topper

EXHIBIT "A"

