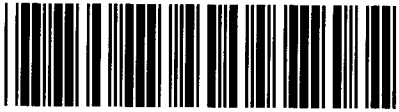




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SOAH DOCKET NO. 473-16-2751  
PUC DOCKET NO. 45624

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APPLICATION OF THE CITY OF  
GARLAND TO AMEND A  
CERTIFICATE OF CONVENIENCE  
AND NECESSITY FOR THE  
PROPOSED RUSK TO PANOLA  
DOUBLE CIRCUIT 345-KV  
TRANSMISSION LINE IN RUSK AND  
PANOLA COUNTIES, TEXAS

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BEFORE THE STATE OFFICE

OF

ADMINISTRATIVE HEARINGS

DIRECT TESTIMONY OF

JULIA H. GREGGS

APRIL 27, 2016

275

**SOAH DOCKET NO. 473-16-2751  
PUC DOCKET NO. 45624**

<b>APPLICATION OF THE CITY OF GARLAND TO AMEND A CERTIFICATE OF CONVENIENCE AND NECESSITY FOR THE PROPOSED RUSK TO PANOLA DOUBLE CIRCUIT 345-KV TRANSMISSION LINE IN RUSK AND PANOLA COUNTIES, TEXAS</b>	<b>§ § § § § § §</b>	<b>BEFORE THE STATE OFFICE  OF  ADMINISTRATIVE HEARINGS</b>
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**DIRECT TESTIMONY OF  
  
JULIA H. GREGGS**

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**DIRECT TESTIMONY OF JULIA H. GREGGS**

**1                                    I.     QUALIFICATIONS AND EXPERIENCE**

**2     Q.     PLEASE STATE YOUR NAME AND ADDRESS.**

**3     A.     My name is Julia H. Greggs.**

**4             My address is:**

**5                     518 Jeff Davis Dr.**

**6                     Richmond, TX 77469**

**7     Q.     HAVE YOU EVER PROVIDED TESTIMONY BEFORE THE PUBLIC  
8             UTILITY COMMISSION OF TEXAS BEFORE?**

**9     A.     No.**

**10    Q.     WOULD YOUR PROPERTY BE AFFECTED BY ONE OR MORE OF  
11            THE SEGMENTS USED TO MAKE ONE OR MORE OF THE  
12            PROPOSED ROUTES FOR THE CITY OF GARLAND'S APPLICATION?  
13            IF SO, PLEASE IDENTIFY THE SEGMENTS THAT WOULD AFFECT  
14            YOU LAND.**

1 A. Yes my property will be affected by any route that includes segment 6.  
2 Segment 6 is in both Southern and Central proposed routes. It is included  
3 in proposed routes 28,41,46,50, and 53.

4 **Q. WHAT MATERIALS HAVE YOU REVIEWED FOR YOUR**  
5 **PREPARATION OF THIS TESTIMONY?**

6 A. I have reviewed the statutory routing criteria and the routing criteria set out  
7 in the Commission's rule. I have reviewed the map provided by Garland,  
8 including an enlarged section of the map showing my property being  
9 bisected. I have also reviewed the route discussed at the meeting in  
10 Carthage. I am familiar with the segments comprising that route. I have  
11 also reviewed the Commission's brochure provided to me by Garland.

12 **Q. IS THE INFORMATION CONTAINED IN YOUR TESTIMONY TRUE AND**  
13 **CORRECT TO THE BEST OF YOUR INFORMATION?**

14 A. Yes.

15 **II. PURPOSE OF THE TESTIMONY**

16 **Q. WHAT IS THE PURPOSE OF YOUR TESTIMONY?**

17 A. The purpose of my testimony is to show that the facts demonstrate why it  
18 would be contrary to the routing criteria set out in the statute and  
19 Commission rules for the proposed transmission line to be routed on my  
20 property. Although I sympathize with any landowners having the  
21 transmission line routed on their property, I also discuss a route that I  
22 believe most Intervenors would support and that would comply with  
23 Panola County community values.

1           **III.    WHY THE LINE SHOULD NOT CROSS MY PROPERTY**

2   **Q.    PLEASE DESCRIBE THE BACKGROUND OF THE ACQUISITION OF**  
3   **YOUR PROPERTY AND HOW IT IS UTILIZED.**

4   A.    I inherited the land from my father. It has been in my family from the  
5           1800s for well over 100 years. The property is only 7.8 acres, but it has oil  
6           and gas wells on it. I have been retired for three years and depend greatly  
7           on the royalty income to support me. It is a substantial part of the income  
8           I have for living expenses. The way the line is routed across my property  
9           could interfere with oil and gas production on my property.

10 **Q.    WHAT, IF ANY, ADVERSE IMPACT WOULD THE USE OF THE**  
11 **SEGMENT AFFECTING YOUR LAND HAVE ON HISTORICAL AND**  
12 **AESTHETIC VALUES AND ENVIRONMENTAL INTEGRITY?**

13       Segment 6 crosses FM 1971 and would adversely affect the aesthetics of  
14       the rural environment. The segment also appears to be routed closely  
15       behind a historical church and cemetery close to my property. Since the  
16       property backs up to Lake Murvaul it also has wetland that could be  
17       disturbed and could interfere with the habitat of many water birds and  
18       eagles.

19 **Q.    ARE THERE ANY NEARBY RECREATIONAL OR PARK AREAS THAT**  
20 **WOULD BE AFFECTED IF THE ROUTE USING THE SEGMENT**  
21 **IMPACTING YOUR PROPERTY IS USED?**

22 A.    The segment then passes through a small community 2 or 3 miles from  
23       my property. There is a community park used by the residents of the

1 community where children play. The segment appears to go close to the  
2 park. My land also backs up to Lake Murvaul making it possible for  
3 people to enjoy the lake.

4 **Q. HAS THE PROPOSED TRANSMISSION LINE BEEN ROUTED ON**  
5 **YOUR PROPERTY SO AS TO MODERATE ANY IMPACT TO YOU AND**  
6 **YOUR FAMILY?**

7 A. The routing of Segment 6 across my land could not be more terrible or  
8 more in violation of the routing criteria. It simply bisects my property. It  
9 does not parallel any of the items listed in the routing criteria.

10 **Q. DOES THE SEGMENT ON YOUR PROPERTY PARALLEL AN**  
11 **EXISTING TRANSMISSION LINE? IF IT DOES, HOW MANY**  
12 **TRANSMISSION LINES ALREADY CROSS YOUR PROPERTY?**  
13 **WOULD THE NEW LINES BE CLOSER TO A HABITABLE**  
14 **STRUCTURE THAN ANY EXISTING TRANSMISSION LINES ON YOUR**  
15 **PROPERTY?**

16 A. The route would not parallel any existing transmission line.

17 **Q. DOES THE ROUTING OF THE TRANSMISSION LINE PARALLEL**  
18 **YOUR PROPERTY BOUNDARIES?**

19 A. The routing of the proposed transmission line bisects my land. It does not  
20 parallel my property boundaries.

21 **Q. DOES THE ROUTING OF THE LINE ON YOUR PROPERTY PARALLEL**  
22 **EXISTING ROADS, HIGHWAYS, OR OTHER COMPARABLE RIGHT-**  
23 **OF-WAY? IF NOT, WHERE DOES IT CROSS YOUR PROPERTY?**

1 A. The proposed routing of the line does not parallel any existing roads,  
2 highways or other comparable right-of-way. It crosses a bordering Farm  
3 to Market road and bisects my property.

4 **Q. IS THE ROUTING OF THE TRANSMISSION LINE ON YOUR**  
5 **PROPERTY WITHIN 500 FEET OF A HABITABLE STRUCTURE?**

6 A. Yes, one of the proposed routes is very close to a habitable structure, the  
7 church and cemetery mentioned earlier where community meetings are  
8 also held.

9 **Q. ARE THERE ANY HEALTH ISSUES THAT COULD BE ADVERSELY**  
10 **AFFECTED IF THE TRANSMISSION LINE IS ROUTED ACROSS YOUR**  
11 **PROPERTY? IF SO, PLEASE EXPLAIN.**

12 A. Since there are elderly people in the community it must be assumed that  
13 some members of the community could have pace-makers for their hearts,  
14 which could be adversely affected.

15 **Q. IN YOUR OPINION, DOES THE ROUTING OF THE TRANSMISSION**  
16 **LINE ON YOUR PROPERTY CONFORM WITH COMMUNITY VALUES?**  
17 **IF NOT, PLEASE EXPLAIN WHY IT DOES NOT.**

18 A. The routing of the transmission line on my property does not conform to  
19 community values. The routing criteria lists those values important to a  
20 community. The proposed route does not meet those values as has been  
21 discussed. It appears that the company simply has drawn as straight a  
22 line as possible to save money rather than trying to minimize the harm to  
23 landowners.



1 Q. WOULD THE ROUTING OF THE TRANSMISSION LINE ON YOUR  
2 PROPERTY ADVERSELY AFFECT YOUR BUSINESS OR OTHER  
3 INCOME PRODUCING ACTIVITIES? IF SO, PLEASE EXPLAIN.

4 A. To the extent it interferes with oil and gas production and the selling of  
5 timber it would adversely affect the income I will need in my retirement  
6 years on which I will have to live.

7 IV. A ROUTE THAT PROTECTS COMMUNITY VALUES

8 Q. WHAT ROUTE, IN YOUR OPINION, BEST SUPPORT COMMUNITY  
9 VALUES?

10 A. A route comprised of segments 1, 7, 9, 13, 23, 24, 28, 31, 34, 41, and 43.  
11 It appears from City of Garland's map that there are only six Intervenor  
12 that are on those segments. It seems they have only three habitable  
13 structures that are within 500 feet of the transmission line. I also strongly  
14 recommend that the utility be required to route the transmission line on the  
15 Intervenor's property so that it would have minimal impact on their  
16 property in accordance with the Intervenor's wishes.

17 V. A REASONABLE CONDITION THAT SHOULD APPLY

18 Q. ARE THERE REASONABLE CONDITIONS THAT SHOULD BE  
19 INCLUDED IN THE ORDER IN THIS PROCEEDING THAT WOULD BE  
20 IN THE PUBLIC INTEREST?

21 A. Yes. City of Garland said at the technical conference held in Carthage,  
22 Texas on April 20, 2016 that no progress had been made to construct the  
23 transmission line to Mississippi and Alabama from the DC tie because of

1 financial reasons. I urge the Commission to condition the condemnation  
2 and purchase of transmission easement for the City of Garland's proposed  
3 Rusk to Panola 345 kV transmission project until Southern Cross provides  
4 sufficient evidence to this Commission that sufficient financing and state  
5 authority has been obtained to construct the transmission line to  
6 Mississippi and Alabama. Panola landowners should not have their land  
7 taken if in fact the transmission line proposed to be built to Mississippi and  
8 Alabama is never built. Without the proposed transmission line in SERC  
9 being built there will be no Southern Cross Project. It is reasonable and in  
10 the public interest to ensure that landowner property is not condemned if  
11 the project will never come to fruition.

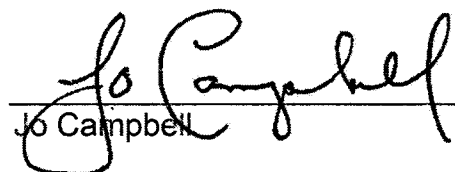
12 **VI. CONCLUSION**

13 **Q. DOES THIS COMPLETE YOUR TESTIMONY?**

14 **A.** Yes, it does.

**CERTIFICATE OF SERVICE**

I hereby certify that a true and correct copy of the foregoing document was served on all parties in compliance with the Judge's Order No. 3 on the 27<sup>th</sup> day of April, 2016.

  
Jo Campbell