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SOAH DOCKET NO. 473-18-2500  
PUC DOCKET NO. 47884

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PUBLIC UTILITIES COMMISSION  
FILING CLERK

APPLICATION OF RAYBURN § BEFORE THE STATE OFFICE  
COUNTRY ELECTRIC §  
COOPERATIVE, INC. TO AMEND §  
CERTIFICATE OF CONVENIENCE § OF  
AND NECESSITY FOR THE LOWER §  
BOIS D' ARC WATER TREATMENT §  
PLANT 138-KV TRANSMISSION LINE §  
PROJECT IN FANNIN AND HUNT § ADMINISTRATIVE HEARINGS  
COUNTIES, TEXAS §

**DIRECT TESTIMONY**

*of*

**PAUL GANT, INDIVIDUALLY AND AS TRUSTEE, AND ON BEHALF OF  
BILLY R. GANT, TRUSTEE**

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## I. INTRODUCTION

**Q. Please state your name and address.**

A. My name is Paul Gant. My address is 3904 F.M. 1553, Leonard, TX 75452.

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

A. I received a degree in Business (Real Estate) in 1987. I have a general insurance license and own an insurance company, maintenance company and I am also a rancher.

**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 as Trustee, and on behalf of Billy R. Gant, Trustee.

**Q. Can you describe your interest in SOAH Docket No. 473-18-2500 and PUC Docket No. 47884.**

A. I intervened in this proceeding as a potentially affected landowner. I own an undivided interest in property in Fannin County which might be impacted by the transmission line proposed to be built by Rayburn Country Electric Cooperative, Inc. ("RCEC") in this docket (the "Property").

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

A. Yes.

**Q. Briefly describe your ownership history in the affected property.**

A. I purchased the property two years ago.

## 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 AND IMPACT**  
2 **OF THE TRANSMISSION LINE ON THE PROPERTY**

3 **Q. Please describe your property.**

4 A. I own approximately 235 acres in Fannin County. There is an approximate 164-acre tract  
5 and an approximate 55.5-acre tract that will be impacted by the proposed transmission line,  
6 if any route utilizing Link 14 is approved by the PUC. The properties have been identified  
7 by RCEC as Tracts 72047 and 72046 and are depicted on Exhibit "A" attached to my  
8 testimony. I own Tract 72047 individually, and Tract 72046 is owned through a trust I set  
9 up for my children.

10 **Q. Are there any habitable structures or other improvements on your property?**

11 A. There is a home, a shed, and my maintenance company has a building on the Property. In  
12 addition to the habitable structures, the Property has been improved with pipe fence, a road,  
13 two water wells, and a cattle coral.

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

15 A. The terrain of the Property consists of a mixture of pastureland used for cattle grazing, and  
16 wooded areas. Located on the Property are three ponds and Sugar Loaf Creek. The area  
17 surrounding Sugar Creek Loaf consists of wetlands and is a habitat for beaver, owls and  
18 other birds. Other wildlife such as deer, pigs, and rabbit inhabit the Property as well. The  
19 trees and water features present on the Property are important to wildlife and ecology of  
20 the area.

21 **Q. Are there any existing transmission lines that cross the Property?**

22 A. No.

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

24 A. The Property is my homestead and is used for cattle ranching. I also conduct my insurance  
25 and maintenance businesses from the Property.

26 **Q. Are there planned future uses of the Property that are different from the current  
27 use(s)? If so, please explain.**

28 A. Yes, my children plan to build homes on the Property.

29 **Q. If the transmission line is built on the Property, do you have any concerns about  
30 RCEC having access to the Property?**

1 A. Yes, I have the general concerns of landowners who are required to give third parties access  
2 to their property, especially so close to my home. I hope that RCEC will respect my  
3 Property if I am required to give them access.

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

5 A. I am concerned about the health and safety issues potentially associated with transmission  
6 lines because I live on the Property and because it appears that the proposed line will be  
7 near to my home and cattle on the Property. I am also concerned about the negative affect  
8 on the aesthetics and the potential devaluation of my Property as a result of the line.  
9 Additionally, the Property stays wet most of the year and would make it very difficult for  
10 RCEC's vehicles to traverse the Property, which I am concerned could cause damage to  
11 my Property or be problematic if there were an outage or other emergency. Please note  
12 that I am not an expert on property valuation or medical issues; my comments merely  
13 reflect my personal concerns.

14 **IV. CONCLUSIONS AND RECOMMENDATIONS**

15 **Q. Please summarize your position in this proceeding regarding RCEC's proposed**  
16 **alternative routes.**

17 A. I am very opposed to the use of Link14, and any route utilizing the same (i.e., Route A). I  
18 specifically support Route Modified L.

19 **Q. In particular, why do you support Route Modified L?**

20 A. Based on my review of RCEC's proposed routes, Route Modified L: (1) would avoid my  
21 Property; (2) is only 0.33 miles longer than Route L, which is the shortest route; (3) has  
22 one fewer habitable structure than Route L ; and (4) would cost only \$342,530 more than  
23 Route L, which is the cheapest route. I would also support other similar routes that do not  
24 affect my property.

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

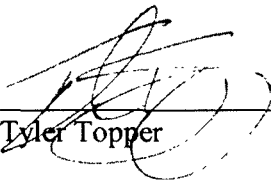
26 A. Yes, that concludes my testimony, subject to subsequent correction.

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**CERTIFICATE OF SERVICE**

This is to certify that on the 6<sup>th</sup> day of June, 2018 a true and correct copy of the preceding document was served in accordance with SOAH Order No. 1 in this docket.

  
Tyler Topper

# EXHIBIT "A"

