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

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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

JAMES STONE, III

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I. INTRODUCTION

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

3 A. My name is James Stone, III. My address is 13220 Wellshire Court, Plano, TX 75093.

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

5 A. I received a Bachelors in Business degree from Texas Christian University in 1995. I am
6 the founder and President of The Medicus Firm, and have worked in the physician
7 staffing industry since 1995.

8 **Q. Have you ever participated or testified in another proceeding before the Public Utility
9 Commission of Texas (“PUC”)?**

10 A. No.

11 **Q. On whose behalf are you testifying?**

12 A. I am testifying on my own behalf.

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

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

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

20 A. Yes.

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

22 A. I originally bought 90 acres in 2011, and added an additional 151 acres adjacent to the
23 original property in late 2015. I sold 30 acres of the original tract, including the home, in
24 January 2018.

II. PURPOSE OF TESTIMONY

26 **Q. What is the purpose of your testimony?**

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

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

3 A. Yes, it is.

4 **III. DESCRIPTION OF THE PROPERTY AND IMPACT**
5 **OF THE TRANSMISSION LINE ON THE PROPERTY**

6 **Q. Please describe your property.**

7 A. I own an approximate 150-acre tract in Fannin County that will be impacted by the
8 proposed transmission line, if any route utilizing Link 14 is approved by the PUC. This
9 property has been identified by RCEC as Tract 86453 and is depicted on Exhibit "A"
10 attached to my testimony.

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

12 A. I am currently constructing a new home on the Property.

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

14 A. The terrain of the Property consists of a mixture of hills, trees and open pastureland. There
15 is a creek that crosses the Property and approximately nine ponds on the Property.

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

17 A. No.

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

19 A. The Property is used for recreational enjoyment and is also leased to ranchers.

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

22 A. Yes, I have the general concerns of landowners who are required to give third parties access
23 to their property. I hope that RCEC will respect my Property if I am required to give them
24 access.

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

26 A. I am concerned about the negative affect the proposed line will have on the aesthetics of
27 my Property. I am also concerned with the potential devaluation to my Property as a result
28 of this proposed line. Please note that I am not an expert on property valuation; my
29 comments merely reflect my personal concerns.

1 **IV. CONCLUSIONS AND RECOMMENDATIONS**

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

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

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

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

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

13 A. Yes, that concludes my testimony, subject to subsequent correction.
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CERTIFICATE OF SERVICE

This is to certify that on the 8th 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.

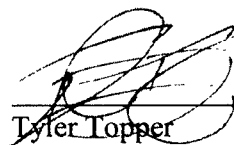

Tyler Topper

EXHIBIT "A"

