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JOINT APPLICATION OF SHARYLAND § BEFORE THE STATE OFFICE
UTILITIES, L.P. AND THE CITY OF §
LUCCOCK, ACTING BY AND THROUGH §
LUBBOCK POWER & LIGHT, FOR A §
CERTIFICATE OF CONVENIENCE AND §
NECESSITY FOR THE WADSWORTH TO § OF
NEW OLIVER TO FARMLAND 345-KV §
TRANSMISSION LINE IN LUBBOCK AND §
LYNN COUNTIES AND THE SOUTHEAST §
TO NEW OLIVER TO OLIVER 115-KV §
TRANSMISSION LINE IN LUBBOCK §
COUNTY § ADMINISTRATIVE HEARINGS

DIRECT TESTIMONY

of

JEFFERY AND CATHY JOHNSON

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1 **I. INTRODUCTION**

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

3 A. Our names are Jeffery Dale Johnson and Cathy Ann Johnson. Our address is 7225 East
4 County Road 7200, Slaton, Texas 79364.

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

6 A. I (Jeffery) have a Bachelor's of Science degree in Agronomy. I have worked as a farmer
7 nearly all my life.

8 I (Cathy) have a Master's of Science in Nursing, and have been a nurse for thirty-five
9 years.

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

12 A. No.

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

14 A. We are testifying on our own behalf.

15 **Q. Can you describe your interest in SOAH Docket No. 473-19-2405 and PUC Docket
16 No. 48909.**

17 A. We intervened in this proceeding as potentially affected landowners. We own an undivided
18 interest in property in Lubbock County, which might be impacted by the transmission line
19 proposed to be built by Sharyland Utilities, L.P. and the City of Lubbock, acting by and
20 through Lubbock Power & Light ("Sharyland" and "LP&L") in this docket (the
21 "Property").

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

23 A. Yes.

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

25 A. We purchased 40.12 acres of the Property in January of 2000, and we purchased the
26 additional ten acres in August of 2005.

27 **II. PURPOSE OF TESTIMONY**

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

29 A. The purpose of our testimony is to: (i) describe our property; (ii) describe the expected
30 impact of the proposed transmission line on our property; (iii) voice our opposition against
31 certain links and routes; and (iv) provide information on the route that we 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. We own an approximate 50.12-acre tract that will be impacted by the proposed
8 transmission line, if any route utilizing Links A24, A25, B58A or B58B is approved by the
9 PUC. This property has been identified by Sharyland and LP&L as Tract R157082 and is
10 depicted on Exhibit "A" attached to my testimony.

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

12 A. We have improved the Property by converting from row irrigation to drip irrigation on 32.5
13 acres, and drilling four irrigation wells (six wells total on the Property). Steel corrals with
14 loading chutes are also located on the Property.

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

16 A. The terrain consists mainly of farmland with grassland and one small playa lake. Scaled
17 quail and other birds inhabit the Property.

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

19 A. No.

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

21 A. The Property is used for farming operations.

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

24 A. We have discussed future development of the Property, however a transmission line would
25 be devastating for any possible development on a tract of this size.

26 **Q. Would you have to regularly drive under the transmission line if installed on the**
27 **Property?**

28 A. Yes, we and all other visitors to the Property would have to regularly drive under the line
29 if any route utilizing Links A24, A25, B58A or B58B is approved for the line.

30 **Q. Are there any historical, archaeological or cultural sites on the Property?**

1 A. Yes, numerous Indian artifacts have been located in the potentially affected area of our
2 Property, where Indians would get clay for making pottery. Examples of these artifacts are
3 depicted on Exhibit "B" attached to our testimony.

4 **Q. If the transmission line is built on the Property, do you have any concerns about**
5 **Sharyland and LP&L having access to the Property?**

6 A. Yes, we have the general concerns of landowners who are required to give third parties
7 access to their property. We hope that Sharyland and LP&L will respect our Property if
8 we are required to give them access.

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

10 A. We are concerned about the negative effect on the aesthetics and the potential devaluation
11 of our Property as a result of the line. We are also concerned about the negative effect the
12 line would have on our ability to effectively farm and irrigate the Property. Please note that
13 we are not experts on property valuation; our comments merely reflect our personal
14 concerns.

15 IV. CONCLUSIONS AND RECOMMENDATIONS

16 **Q. Please summarize your position in this proceeding regarding Sharyland and LP&L's**
17 **proposed alternative routes.**

18 A. I am very opposed to the use of Links A24, A25, B58A and B58B, and any route utilizing
19 the same (e.g., Routes WNF 21 and WNF 22). I specifically support Routes SNO 2 and
20 WNF 6. Alternatively, I would support Routes SNO 2 and WNF 7.

21 **Q. In particular, why do you support SNO 2 / WNF 6?**

22 A. Based on my review of Sharyland and LP&L's filings in this case, the combination of
23 Routes SNO 2 and WNF 6 is my preferred route option when compared to the combination
24 of Routes SNO 9 and WNF 20. **I believe a common-sense approach to routing should**
25 **be used, and that comparing combinations of routes against each other, as opposed to**
26 **separately considering the SNO and WNF routes in isolation from each other, best**
27 **achieves the PUC's objectives.** I believe the combination of SNO 2 / WNF 6 is superior
28 to the combination of SNO 9 / WNF 20 for a number of reasons, including but not limited
29 to the following:

- 30 • SNO 2 / WNF 6 affects 3 fewer habitable structures;
- 31 • SNO 2 / WNF 6 affects 4 fewer newly affected habitable structures;

- SNO 2 / WNF 6 has a greater length of route parallel to existing transmission line ROW (8.6 miles vs. 2.1 miles);
- SNO 2 / WNF 6 has a greater length of route parallel to apparent property lines (13.1 miles vs. 1.81 miles);
- SNO 2 / WNF 6 performs better with regard to total paralleling (90.4% total length vs. 85.7% total length); and
- SNO 2 / WNF 6 has 11 fewer pipeline crossings (19 vs. 30).

Q. In particular, why do you support SNO 2 / WNF 7 as an alternative?

A. Based on my review of Sharyland and LP&L's filings in this case, I support the combination of Routes SNO2 / WNF 7 when compared to the combination of Routes SNO 9 / WNF 20 for a number of reasons, including but not limited to the following:

- SNO2 / WNF 7 is cheaper (approx. \$139,491,000 vs. approx. \$140,343,000);
- SNO2 / WNF 7 is shorter (59 miles vs. 59.8 miles);
- SNO2 / WNF 7 affects 2 fewer habitable structures;
- SNO2 / WNF 7 affects 3 fewer newly affected habitable structures;
- SNO 2 / WNF 7 has a greater length of route parallel to existing transmission line ROW (8.6 miles vs. 2.1 miles);
- SNO 2 / WNF 7 has a greater length of route parallel to apparent property lines (14 miles vs. 1.81 miles);
- SNO 2 / WNF 7 performs better with regard to total paralleling (88.1% total length vs. 85.7% total length);
- SNO 2 / WNF 7 has 11 fewer pipeline crossings (19 vs. 30);
- SNO 2 / WNF 7 has less estimated length of ROW within the foreground visual zone of Interstate, U.S. and State Highways (18.6 miles vs. 21.8 miles); and
- SNO 2 / WNF 7 has less estimated length of ROW within the foreground visual zone of farm-to-market and/or ranch-to-market roads (11.5 miles vs. 14 miles).

Q. Does this conclude your testimony?

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

CERTIFICATE OF SERVICE

This is to certify that on the 6th day of May, 2019 a true and correct copy of the preceding document was served in accordance with SOAH Order No. 2 in this docket.

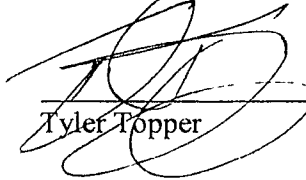

Tyler Topper

EXHIBIT "A"



EXHIBIT "B"



Indian artifacts located in the potentially affected area of our property.