



## Filing Receipt

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**SOAH DOCKET NO. 473-22-0493  
PUC DOCKET NO. 52656**

<b>APPLICATION OF AEP TEXAS, INC. TO AMEND ITS CERTIFICATE OF CONVENIENCE AND NECESSITY FOR THE ANGSTROM-TO- NAISMITH DOUBLE-CIRCUIT 345- KV TRANSMISSION LINE IN SAN PATRICIO COUNTY</b>	§ § § § § § § § §	<b>BEFORE THE STATE OFFICE  OF  ADMINISTRATIVE HEARINGS</b>
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**DIRECT TESTIMONY OF INTERVENOR VIRGINIA BRUNKS**

Intervenor, Virginia Brunks files this Direct Testimony, which is attached. Intervenor stipulates that this Direct Testimony can be treated by all parties as if the answers were filed under oath.

Respectfully submitted,



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**ATTORNEY FOR INTERVENOR  
Virginia Brunks**

**CERTIFICATE OF SERVICE**

I certify that a copy of this document will be served on all parties of record on December 15, 2021 in accordance with the Second Order Suspending Rules issued in Project No. 50664

A handwritten signature in black ink, appearing to read 'Frank Armstrong', written over a horizontal line.

Frank Armstrong

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1 **I. INTRODUCTION**

2  
3 QUESTION: PLEASE STATE YOUR NAME AND CURRENT ADDRESS FOR THE  
4 RECORD.

5  
6 ANSWER: My name is Virginia Brunks. My mailing address is 5017 County Road  
7 1432, Aransas Pass, Texas 78336.

8  
9 QUESTION: ARE YOU AN INTERVENOR IN SOAH DOCKET NO. 473-22-0493  
10 AND PUC DOCKET NO. 52656?

11  
12 ANSWER: Yes, my Motion to Intervene was filed on November 9, 2021 and was  
13 Granted by SOAH Order No. 4 on November 30, 2021

14  
15 QUESTION: HAVE YOU EVER TESTIFIED IN A PUBLIC UTILITY COMMISSION  
16 OF TEXAS ("PUC" OR "COMMISSION") PROCEEDING

17  
18 ANSWER: No.

19  
20 QUESTION: DOES AEP TEXAS, INC. HAVE YOUR PROPERTY CORRECTLY  
21 LOCATED?

22  
23 ANSWER: Based on the maps and other information which I have reviewed, it  
24 appears to me that my property, which is identified as Map ID 1094 in AEP's Application  
25 is correctly located.  
26

## **II. PURPOSE AND SCOPE OF TESTIMONY**

QUESTION: WHAT IS THE PURPOSE AND SCOPE OF YOUR TESTIMONY?

ANSWER: I am filing this Direct Testimony in order to describe my property and the use of my property, to set out my concerns as to the impact the proposed large transmission line would have on my property and to express my opposition to any routes that would include Link AM as depicted on the maps set out in AEP's Application. I am also filing this Direct Testimony to support Route 16 as currently depicted or as modified.

QUESTION: WHAT ARE YOUR CONCERNS ABOUT THE PROPOSED TRANSMISSION LINE USING LINK AM AS FILED?

ANSWER: Link AM, as currently depicted on AEP's maps attached to the Application runs parallel to Highway 136 across the road from my property. I am opposed to having a large 345-kV transmission line across the road from my property for the following reasons: (a) the presence of a 345-kV transmission line will greatly impact the value of my property; (b) a 345-kV transmission line constructed on BOLD lattice type structures will be unsightly and will limit my ability to develop my property in the future; (c) I have concerns about a 345-kV transmission line impacting my tv reception and possibly causing buzzing or humming noise which could be detected from the houses on my property and, (d) I also have a general concern about health and safety issues resulting from living close to a 345-kV transmission line.

## **III. DESCRIPTION OF PROPERTY AND THE LINE'S IMPACT**

QUESTION: ARE THERE ANY HABITABLE STRUCTURES ON THE PROPERTY?

ANSWER: Yes, there are currently three (3) homes on my property.

QUESTION: PLEASE DESCRIBE YOUR PROPERTY'S CURRENT USES.

ANSWER: My property is used as the residences for myself and my two sons. The remainder of my property is grassland used to raise livestock.

QUESTION: PLEASE DESCRIBE ANY PLANNED FUTURE USES OF YOUR PROPERTY IF THOSE USES ARE DIFFERENT FROM THE CURRENT USES PREVIOUSLY DESCRIBED.

ANSWER: My property fronts on Highway 136 which is easily accessible from the Gregory-Portland area where the new Gulf Coast Growth Venture chemical complex is located. Highway 136 in the area where my property is located has, in the recent past, seen substantial development for single family homes with small acreage tracts. I believe that my highway frontage on Highway 136 lends itself to being developed for single family homes in the near future.

QUESTION: DESCRIBE THE AESTHETIC IMPACT TO THE PROPERTY IF AEP TEXAS INC. BUILDS A 345-KV TRANSMISSION LINE ON THE PROPERTY.

ANSWER: A 345-kV transmission line across the road from my highway frontage would decrease the value of my property for housing development. If tall BOLD lattice towers were to be used in the construction of the proposed transmission line, these unsightly and intrusive structures will only serve to further depreciate the value of my property.

#### **IV. CONCLUSION AND RECOMMENDATIONS**

QUESTION: IS THERE AN ALTERNATIVE ROUTE OR ROUTES YOU SUPPORT?

ANSWER: Yes. I support Route 16.

QUESTION: IF YOU ANSWERED YES TO THE PREVIOUS QUESTION, WHY DO YOU SUPPORT SUCH ROUTE OR ROUTES?

ANSWER: As indicated by Power Engineers in its Environmental Assessment and Routing Analysis, Route 16 is the best overall route among the alternatives presented when considering all of the criteria established by the PUC in considering routing options. According to Power Engineers, Route 16: (a) has the fewest number of habitable structures within close proximity to the route; (b) is tied with one other route with the fewest number of pipeline crossings; (c) is tied with four other routes with the shortest length of right-of-way across NWI mapped wetlands; (d) is tied with six other routes for the shortest length across 100-year floodplains; and (e) has the second shortest length of right-of-way across areas of high archaeological site potential. In addition, Route 16 is the third least costly route based on the estimated cost data included in AEP's Application.

QUESTION: DO YOU SUPPORT MODIFICATIONS TO LINKS ALONG ROUTE 16 IF REQUESTED BY OTHER LANDOWNERS, AND IF SO, WHY?

ANSWER: I support modifications to any links included in Route 16 if requested by affected landowners and if such modifications are consistent with the routing criteria established by the PUC.

QUESTION: DOES THIS CONCLUDE YOUR TESTIMONY?

ANSWER: Yes.