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**SOAH DOCKET NO. 473-22-2156
PUC DOCKET NO. 53053**

APPLICATION OF ONCOR	§	BEFORE THE STATE OFFICE
ELECTRIC DELIVERY COMPANY	§	
LLC TO AMEND ITS CERTIFICATE	§	
OF CONVENIENCE AND NECESSITY	§	OF
FOR THE IVY LEAGUE 138-KV	§	
TRANSMISSION LINE IN COLLIN	§	
COUNTY	§	ADMINISTRATIVE HEARINGS

**AMENDED DIRECT TESTIMONY OF RON THOMAS ON BEHALF OF
INTERVENOR COMSOR CORP.**

Ron Thomas on behalf of Intervenor Comsor Corp. (“Comsor”) files this Amended Direct Testimony, which is attached, and stipulates that this Amended Direct Testimony can be treated by all parties as if the answers were filed under oath.

Respectfully submitted,

BRAUN & GRESHAM, PLLC
P.O. Box 1148 (Mailing)
Dripping Springs, Texas 78620
14101 Hwy. 290 W., Suite 1100B (Physical)
Austin, Texas 78737
512-894-5426 (telephone)
512-894-3405 (fax)

/s/Patrick L. Reznik

Patrick L. Reznik
State Bar No. 16806780
preznik@braungresham.com
Carly Barton
State Bar No. 24086063
cbarton@braungresham.com

ATTORNEYS FOR COMSOR CORP.

CERTIFICATE OF SERVICE

I hereby certify that a copy of the foregoing has been served on all parties of record on June 7, 2022, in accordance with the commission's Second Order Suspending Rules issued on July 16, 2020, in Project No. 50664 and SOAH Order No. 2 issued in this docket.

/s/Patrick L. Reznik

Patrick L. Reznik

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1 **I. INTRODUCTION**

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

5
6 ANSWER: Ron Thomas, International Capital LLC, 17130 Dallas Parkway, Suite
7 240; Dallas, TX 75248.

8
9
10 QUESTION: ARE YOU AN INTERVENOR IN SOAH DOCKET NO. 473-22-2156
11 AND PUC DOCKET NO. 53053 AND ON WHOSE BEHALF ARE YOU
12 TESTIFYING?

13
14 ANSWER: Yes. I am testifying on behalf of Intervenor, Comsor Corp.

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

19
20 ANSWER: No.

21
22
23 QUESTION: BRIEFLY DESCRIBE YOUR OCCUPATION, EDUCATIONAL AND
24 WORK HISTORIES.

25
26 ANSWER: For the last 15 years, I have been the Director of Consulting Services and
27 Land Development at International Capital. I received my BA in Business Administration
28 and Economics from Austin College in Sherman, TX in 1972 and have been in various
29 Commercial Real Estate activities since that time.

30
31
32 QUESTION: WHERE IS THE PROPERTY LOCATED?

33
34 ANSWER: Comsor's property ("Comsor's Property") is located in the City of
35 Princeton, Texas, approximately 9 miles east of U.S. Highway 75 and on the south side
36 of U.S. Highway 380. **See Exhibit A** attached hereto. Comsor's Property has
37 approximately 1250 feet of frontage on the south side of U.S. Highway 380.

1 QUESTION: HOW LONG HAVE YOU OWNED THE PROPERTY?

2
3 ANSWER: Since February 12, 2018.
4
5

6 HOW ARE YOU INVOLVED WITH THE PROPERTY?
7

8 ANSWER: I have been actively involved in Comsor's and IC-SB's objective and
9 efforts to develop the Property. I was involved in the acquisition of Comsor's Property by
10 IC-SB Princeton Land Partners, LP ("IC-SB") in June 2016. Comsor's Property is a part
11 of approximately 297 acres of property in this area (such approximately 297 acres of
12 property herein called "Princeton Crossroads"). I was also involved in the acquisition of
13 Comsor's Property by Comsor from IC-SB in February 2018.
14
15

16 QUESTION: ARE YOU FAMILIAR WITH THIS AREA OF COLLIN COUNTY,
17 TEXAS?
18

19 ANSWER: Yes. I have been continually and actively involved in real estate
20 development in this area of Collin County since 2012.
21
22

23 QUESTION: PLEASE EXPLAIN THE CURRENT AND REALISTIC ANTICIPATED
24 GROWTH IN THIS AREA OF COLLIN COUNTY, TEXAS?
25

26 ANSWER: Collin County's population is currently 940,000 and is expected to grow to
27 3 million by 2040. Princeton is one of the fastest growing cities in Collin County which is
28 projected to grow to 80,000 residents (currently 22,000) by 2050. Most recently, part of
29 this growth has been the Princeton Crossroads development.
30
31

32 HOW HAS PRINCETON CROSSROADS CONTRIBUTED TO THE GROWTH?
33

34 ANSWER: Princeton Crossroads is a master-planned mixed-use neighborhood
35 community surrounding the new Princeton City Hall and City park for people in the
36 community to socialize and to have gatherings. The project has included procuring public

1 financing for infrastructure developments through the creation of the Princeton
2 Crossroads Public Improvement District covering Princeton Crossroads, planned phases
3 of development of Princeton Crossroads, sales of individual tracts of Princeton
4 Crossroads for residential, multi-family, commercial, retail, and/or mixed use, and
5 managing construction of infrastructure improvements to serve the community within
6 Princeton Crossroads.

7
8 WHAT IS PRINCETON CROSSROADS?

9
10 ANSWER: To date, Princeton Crossroads consists of: (i) approximately 88 acres
11 currently used for single-family residential homes and another approximately 24 acres to
12 be used for single-family residential homes rent, (ii) approximately 7 acres currently used
13 for multi-family use and another approximately 12 acres to be used for multi-family use,
14 (iii) approximately 5.4 acres to be used for retail use, (iv) approximately 1.3 acres
15 currently used as a 7-Eleven gas station and convenience store (the “7-Eleven Tract”), (v)
16 approximately 15 acres owned by the City of Princeton and currently used as the City of
17 Princeton’s new City Hall and City Park (the “Princeton City Hall and Park Tract”), (vi)
18 Comsor’s Property (which is approximately 25 acres) to be used for retail use by an
19 anchor grocery store (such as a Kroger Marketplace) and other businesses, and (vii) with
20 the remaining approximately 85 acres to be used for a school, daycare, other commercial
21 or retail use, and/or hospitality use. See **Exhibit B** attached hereto.

22
23
24 **II. PURPOSE AND SCOPE OF TESTIMONY**

25
26 QUESTION: WHAT IS THE PURPOSE AND SCOPE OF YOUR TESTIMONY?

27
28 ANSWER: The purpose of my testimony is to (a) describe my property; (b) describe
29 the expected impact of the proposed transmission line on my property; (c) voice my
30 opposition against any route coming out of the TNMP substation to the north or the Ivy
31 League Substation to the east (“Eastern Routes”) and in particular any routes that use
32 Segments S3 and R7; and (d) voice my support for Oncor’s recommended Route 4626.

1
2 QUESTION: IN PARTICULAR, WHAT ARE YOUR CONCERNS ABOUT THE
3 PROPOSED TRANSMISSION LINE USING ONCOR'S ELECTRIC SEGMENTS S1,
4 S2, S3, R2, R4, R6, R7, R51, and R52?

5
6 ANSWER: The above referenced Segments S1, S2, S3, R2, R4, R6, R7, R51, and R52
7 all impact and cross over properties within Princeton Crossroads (with Segments S3, R4,
8 and R7 crossing directly over Comsor's Property) and will hinder the development of
9 Comsor's Property and such other properties and Comsor's objective of creating a
10 neighborhood community surrounding the Princeton City Hall and Park Tract.

11 In general, we are opposed to the construction of proposed Oncor transmission
12 line through our neighborhood community because of the following perceptions and
13 beliefs: (1) a 138-kV transmission line will severely depreciate the value of our properties
14 and surrounding area; (2) a 138-kV transmission line will severely detract from the
15 aesthetic values of the properties and surrounding area; (3) a 138-kV transmission line
16 would negatively impact community, economic and historical values and the character
17 the properties and surrounding area; (4) we and future owners and visitors will have to
18 drive under or near a 138-kV transmission line on a regular basis; (5) for transmission
19 lines crossing the properties, we would be required to give third parties access to our
20 properties, which limits the privacy and control over our properties; and (6) we have
21 general concerns about any buzzing of the 138-kV transmission line, and general health
22 and safety concerns regarding living, working, and being close to a 138-kV transmission
23 line.

24 Additionally, with respect to health and safety concerns, our greatest concern is
25 that Segment S3 crosses over the 7-Eleven Tract (which is used as a gas station/motor
26 fuels facility) and either directly over or in close proximity over the underground storage
27 tanks on the 7-Eleven Tract. *See Exhibit C* attached hereto. With the 7-Eleven Tract
28 being directly across Comsor's Property (over U.S. High Way 380), being only
29 approximately 1,000 feet from the Princeton City Hall and Park Tract, being only
30 approximately 800 feet from the residents living north of the 7-Eleven Tract, and also in
31 close proximity to the other properties within Princeton Crossroads, any casualty event of

1 a 138 kV transmission line over the 7-Eleven Tract would be potentially catastrophic for
2 property and the people in the vicinity, including Comsor's Property, the homes, and the
3 Princeton City Hall and Park Tract and the residents, employees, occupants, and visitors
4 occupying and using properties.

5 Moreover, Oncor will need to utilize Segments U1, U2, T1, T2, T3, T4, T5,
6 and/or T6 to utilize the above referenced Segments S1, S2, S3, R2, R4, R6, R7, R51, and
7 R52. Segments U1, U2, T1, T2, T3, T4, T5, and/or T6 cross over two high schools that
8 serve the Princeton Crossroads community and other communities – Lovelady High
9 School and Princeton High School – and will materially and negatively impact such high
10 schools' use of their respective properties.

11 12 13 **III. DESCRIPTION OF PROPERTY AND THE LINE'S IMPACT** 14

15 QUESTION: ARE THERE ANY HABITABLE STRUCTURES ON THE
16 PROPERTY?
17

18 ANSWER: None at this time on Comsor's Property. Comsor's Property is raw land
19 prime for high-value commercial and retail development, to provide services necessary to
20 serve the growing community of Princeton and Princeton Crossroads.

21
22
23 QUESTION: PLEASE DESCRIBE YOUR PROPERTY'S TERRAIN AND ITS
24 ECOLOGICAL OR BIOLOGICAL FEATURES.

25
26 ANSWER: Comsor's Property is relatively flat with trees in the southern portion of
27 the property and the northeast portion of the property.

28
29
30 QUESTION: PLEASE DESCRIBE YOUR PROPERTY'S CURRENT USES.

31
32 ANSWER: Comsor's Property is currently used for agricultural and other farming
33 uses to qualify for the agricultural ad valorem tax exemption. As noted above, Comsor's
34 Property is a part of the master-planned mixed-used neighborhood community of
35 Princeton Crossroads and will be sold and/or developed for commercial and retail use by

1 an anchor grocery store (such as a Kroger Marketplace) and other businesses to provide
2 services to residents and visitors.

3
4
5 QUESTION: HAVE YOU UNDERTAKEN ANY EFFORTS TO RESTORE THE
6 LAND OR THE ENVIRONMENTAL QUALITY OF THE PROPERTY?

7
8 ANSWER: No.

9
10
11 QUESTION: ARE THERE ANY WATER WELL SITES ON THE PROPERTY? IF
12 SO, DESCRIBE THE GENERAL LOCATION.

13
14 ANSWER: No.

15
16
17 QUESTION: ARE THERE ANY GAS WELLS ON THE PROPERTY? IF SO,
18 DESCRIBE THE GENERAL LOCATION.

19
20 ANSWER: No.

21
22
23 QUESTION: ARE THERE ANY PIPELINE EASEMENTS ON THE PROPERTY? IF
24 SO, DESCRIBE THE GENERAL LOCATION.

25
26 ANSWER: No.

27
28
29 QUESTION: PLEASE DESCRIBE ANY PLANNED FUTURE USES OF YOUR
30 PROPERTY IF THOSE USES ARE DIFFERENT FROM THE CURRENT USES
31 PREVIOUSLY DESCRIBED.

32
33 ANSWER: The future uses of Comsor's Property will be for commercial and retail
34 use potentially by an anchor grocery store (such as a Kroger Marketplace) and other
35 businesses. I also know that concerns regarding the proposed transmission line on
36 Comsor's Property have hindered interest in developing Comsor's Property and that these
37 concerns will remain until this proposed transmission line matter is resolved.

1 QUESTION: PLEASE DESCRIBE THE CURRENT AND PLANNED FUTURE
2 USES OF YOUR PROPERTY AND HOW THOSE USES CONTRIBUTE TO THE
3 COMMUNITY VALUES OF COLLIN COUNTY, TEXAS?
4

5 ANSWER: Comsor is currently working with potential grocery store tenants to
6 develop an anchor grocery store and retail stores on Comsor's Property. Due to the
7 current approximately 22,000 residents (and growing) and only a Walmart in the area
8 serving such residents, a grocery store is desperately needed. Comsor's Property is a part
9 of Princeton Crossroads, a master-planned mixed-use neighborhood community
10 surrounding the Princeton City Hall and Park Tract for residents and visitors of the
11 community to socialize and have gatherings. Princeton Crossroads currently provides a
12 community where residents and visitors can utilize and enjoy open space within the
13 Princeton City Hall and Park Tract. Once fully developed, Princeton Crossroads and the
14 amenities within Princeton Crossroads will serve as the centerpiece for a lifestyle where
15 residents have many choices within their community, and the location encourages
16 workers to re-locate here to be in the vicinity of employers located in Collin County,
17 Texas.
18
19

20 QUESTION: DO ANY EXISTING TRANSMISSION OR DISTRIBUTION LINES
21 CROSS YOUR PROPERTY? IF SO, PLEASE DESCRIBE HOW AND WHERE
22 THEY CROSS THE PROPERTY.
23

24 ANSWER: There are existing water lines, existing sanitary sewer lines, existing
25 drainage improvements, and other utility lines that traverses Comsor's Property. *See*
26 **Exhibit D** attached hereto.
27
28

29 QUESTION: ARE THERE CURRENT PLANS FOR OTHER UTILITY FEATURES
30 ON YOUR PROPERTY? IF SO, PLEASE DESCRIBE HOW AND WHERE THEY
31 CROSS THE PROPERTY.
32

33 ANSWER: Other than the existing water lines, the existing sanitary sewer lines, and
34 the existing utility lines, there are no other plans for utility features on Comsor's Property
35 at this time.

1
2 QUESTION: WOULD THE LINKS THAT MIGHT IMPACT YOUR PROPERTY
3 RUN ALONG ANY BOUNDARY LINES OF YOUR PROPERTY?
4

5 ANSWER: No, they would bisect it.
6
7

8 QUESTION: HOW WOULD A 138-KV ELECTRIC TRANSMISSION LINE
9 IMPACT YOUR PROPERTY AND ITS OPERATIONS?
10

11 ANSWER: Comsor's Property and Princeton Crossroads would be impacted in at least
12 the following manners:
13

- 14 1. The development of a grocery store would not be possible as the proposed
15 transmission line crosses through Comsor's Property.
- 16 2. The value of Comsor's Property and the tracts and homes within Princeton
17 Crossroads would be severely diminished.
- 18 3. Comsor could potentially lose its current agricultural ad valorem tax exemption
19 on Comsor's Property if the transmission line is built on and/or over Comsor's
20 Property.
- 21 4. The negative perception of the transmission line by the public would affect the
22 pricing and timing of the sale or development of Comsor's Property (or any
23 portion thereof), thereby also increasing Comsor's administrative, marketing, and
24 other costs.
- 25 5. It will alter the ultimate outcome for Princeton Crossroads to become a well-
26 rounded destination for Princeton's residents due to the above-mentioned reasons.
- 27 6. The City of Princeton and surrounding areas would lose the opportunity for a
28 primary grocery store to serve its residents, which is desperately needed in the
29 area.
30

31
32 QUESTION: WOULD YOU HAVE TO REGULARLY DRIVE UNDER THE
33 TRANSMISSION LINE IF INSTALLED ON YOUR PROPERTY.
34

1 ANSWER: We and future owners and visitors will have to drive under or near a 138-
2 KV transmission line on a regular basis.

3
4
5 QUESTION: DESCRIBE THE AESTHETIC IMPACT TO YOUR PROPERTY IF
6 ONCOR BUILDS A 138-KV TRANSMISSION LINE ON YOUR PROPERTY.

7
8 ANSWER: Specifically if Segment S3 and R4 or R7 are used as routes for the
9 proposed 138-KV transmission line, the 138-KV transmission line would cross directly
10 over the middle of Comsor's Property and the views facing every direction (including
11 above) on Comsor's Property would be severely and negatively affected. In addition, (i)
12 the views facing west and south of the homeowners and residents of the residential tracts
13 of Princeton Crossroads to the north and east of the proposed 138-KV transmission line
14 would be severely and negatively affected, (ii) the views facing west of the residents of
15 the multifamily tract of Princeton Crossroads to the east of the proposed 138-KV
16 transmission line would be severely and negatively affected, (iii) the views facing east of
17 the residents of the multifamily tracts of Princeton Crossroads to the west of the proposed
18 138-KV transmission line would be severely and negatively affected, (iv) the views
19 facing west of City employees' utilizing and occupying the Princeton City and Park Tract
20 would be severely and negatively affected, and (v) the views facing west of residents and
21 visitors using and enjoying the park/open space of the Princeton City and Park Tract
22 would be severely and negatively affected.

23
24
25 QUESTION: DESCRIBE THE ENVIRONMENTAL IMPACT, SPECIFIC TO THIS
26 AREA, THAT WOULD BE CAUSED BY THIS TRANSMISSION LINE.

27
28 ANSWER: The environmental, safety, and health concerns of the residents and
29 visitors utilizing Comsor's Property and Princeton Crossroads as a gathering place to
30 socialize would be materially jeopardized. ~~A transmission line over or in close proximity~~
31 ~~to the 7-Eleven Tract will create potentially catastrophic situations for Comsor's~~
32 ~~Property, Princeton Crossroads (including the Princeton City Hall and Park Tract), and~~
33 ~~surrounding areas, in addition to the residents, employees, occupants, and visitors of such~~

1 ~~properties if casualty events or other circumstances result in issues with the transmission~~
2 ~~line, which can potentially lead to severe injury or death of residents and visitors and/or~~
3 ~~devastating property damage to the surrounding areas, Comsor's Property, and Princeton~~
4 ~~Crossroads (including the Princeton City Hall and Park Tract).~~

5 We are also expressing our concerns of the proximity of the underground storage
6 tanks situated on the 7-Eleven Tract and the proposed transmission line, as our property
7 is adjacent to the 7-Eleven Tract due to the above-mentioned reasons.

8
9
10 QUESTION: IF THE TRANSMISSION LINE IS BUILT ON YOUR PROPERTY, DO
11 YOU HAVE ANY CONCERNS ABOUT ONCOR HAVING ACCESS TO YOUR
12 PROPERTY?

13
14 ANSWER: Yes, we have the general concerns of landowners who are required to give
15 third parties access to their property. Also, this would materially affect the use of our
16 property. I hope that Oncor will respect my property.

17
18
19 QUESTION: IF THE TRANSMISSION LINE IS BUILT ON YOUR PROPERTY, DO
20 YOU HAVE ANY OTHER CONCERNS?

21
22 ANSWER: In addition to the detail already provided on other answers in this written
23 testimony, we have general safety and health concerns for living around transmission
24 lines and EMF issues. Because potential buyers may be aware of medical studies
25 available on the Internet arguing, correctly or not, a connection between high-powered
26 transmission lines causing health problems and possible cancer, we are concerned about a
27 negative stigma being attached to our property and the possible devaluation of our
28 property value. In addition, the buzzing sounds emanating from high-voltage
29 transmission lines would be bothersome for people living near them.

30
31
32 QUESTION: IS THERE ANYTHING ELSE YOU WOULD LIKE THE
33 ADMINISTRATIVE LAW JUDGE AND THE PUBLIC UTILITY COMMISSION TO
34 CONSIDER IN THIS PROCEEDING?

1 ANSWER: We are concerned that Princeton Crossroads will be less of a community
2 destination as the transmission lines will interfere with the cohesive plan. Princeton
3 Crossroads is an existing master-planned mixed-use neighborhood community where
4 Comsor has invested heavily to date and will continue to make capital investments in.
5 The Eastern Routes as proposed would significantly decrease the value and use of
6 Princeton Crossroads and Comsor's Property and therefore will severely and negatively
7 impact the capital investments that Comsor has made and will continue to make in
8 developing Princeton Crossroads. Furthermore, residents of the City of Princeton have
9 continuously voiced their need for a primary grocery store, and the proposed transmission
10 line would prohibit Comsor's Property from being developed as a grocery store (in
11 addition to other retail stores).

12
13
14 **IV. CONCLUSION AND RECOMMENDATIONS**
15

16 QUESTION: HOW WOULD YOU SUMMARIZE YOUR POSITION IN THIS
17 PROCEEDING REGARDING ONCOR'S RECOMMENDED ROUTE 4626 AND THE
18 PROPOSED ALTERNATIVE ROUTES?
19

20 ANSWER We adamantly oppose any of the Eastern Routes. We also oppose any
21 route using Segments S1, S2, S3, R2, R4, R6, R7, R51, and R52. We fully support
22 Oncor's Proposed Alternative Route 4626 as the route that best meets the overall
23 community values and PURA § 37.056(c)(4) and P.U.C. SUBST. R. 25.101(b)(3)(B).
24

25
26 QUESTION: DOES THIS CONCLUDE YOUR TESTIMONY?
27

28 ANSWER: Yes.



Source: Esri, Maxar, GeoEye, Earthstar Geographics, CNES/Airbus DS, USDA, USGS, AeroGRID, IGN, and the GIS User Community

Y-12 REACTOR
4,050 S.F.
P.F.E. = 578.78
PROPOSED LOT
55,178 S.F.
1.24 ACRES

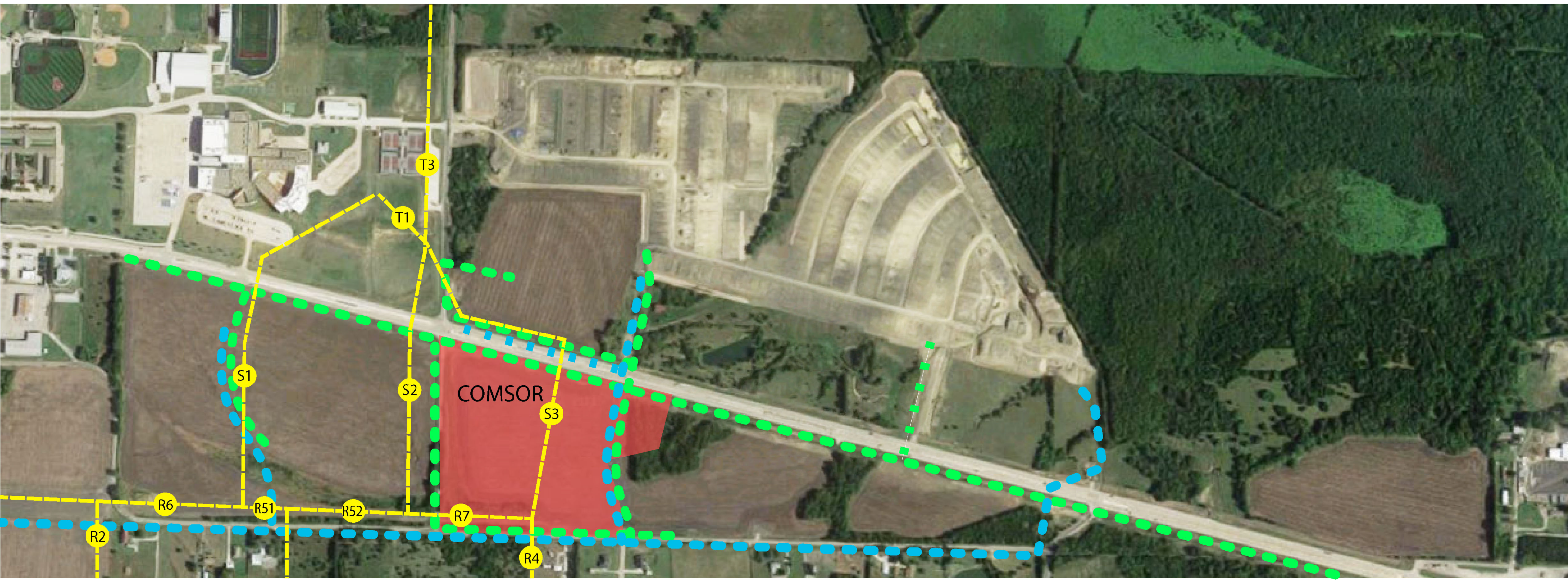
FUELING CANOPY

UNDERGROUND STORAGE TANK

GRAPHIC SCALE
(OF FEET)
1 inch = 30 ft.

PROPOSED TRANSMISSION LINE

EXHIBIT D



- EXISTING SANITARY SEWER FACILITIES
- EXISTING WATER FACILITIES
- PROPOSED TRANSMISSION LINES
- SUBJECT PROPERTY