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DIRECT TESTIMONY
of
PETER J. WANGOE II
on behalf of
JTS 3.8, LLC

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DIRECT TESTIMONY OF PETER J. WANGOE II

I. POSITION AND QUALIFICATIONS

Q. PLEASE STATE YOUR NAME AND ADDRESS:

A. My name is Peter J. Wangoe II. I own a membership interest in JTS 3.8, LLC. My business address is 365 Miron Drive, Suite A, Southlake, TX 76226.

Q. PLEASE DESCRIBE YOUR PROFESSIONAL QUALIFICATIONS.

A. Since 1988 I have been a licensed real estate professional with Coldwell Banker. I have nearly 35 years of experience in commercial and residential real estate sales, leasing and development. Additionally, I am the President of Office Equity Solutions, the development manager of the Justin Town Square ("JTS") project in Justin, TX. Justin Town Square is a mixed commercial and municipal complex that adjoins Trail Creek and Bishop Park. Office Equity Solutions has nearly 30 years of development experience in retail, medical and neighborhood commercial development.

II. DESCRIPTION OF THE PROPERTY AND HISTORY OF THE JTS PROJECT

Q. PLEASE DESCRIBE YOUR HISTORY WITH THE PROPERTY POTENTIALLY AFFECTED BY SEGMENT J4 OF THE RAMHORN HILL – DUNHAM 345 kV TRANSMISSION LINES.

A. In 2020, Justin Town Center, Ltd. purchased approximately 18 acres of property, adjoining 18 acres of City of Justin owned property that adjoins Trail Creek and Bishop Park. Additionally, in 2020 Justin Town Center, Ltd. contracted with Office Equity Solutions to provide project development management as it pertains to the JTS project. Since 2020 the JTS project has been in design, engineering, platting, architecture, permitting, construction of infrastructure and roads and most recently site preparation for construction of the first buildings in the development. The entire JTS project covers approximately 40 acres total with a projected 275,000 square feet of planned mixed commercial and municipal facilities. The completed project is anticipated to cost in excess of \$100 million dollars. In 2022, JTS 3.8, LLC acquired property from the City of Justin as part of a 380 Agreement with Justin Town Center, Ltd. The members of JTS 3.8, LLC are some of the same partners in Justin Town Center, Ltd. and this property has been part of the JTS project since the beginning in either the City of Justin's or JTS

31 3.8, LLC's ownership. Office Equity Solutions is contracted to provide project development
32 management to JTS 3.8, LLC as it pertains to the JTS project.

33
34 **III. PURPOSE OF TESTIMONY**

35 Q. WHAT IS THE PURPOSE OF YOUR TESTIMONY?

36 A. The purpose of my testimony is to voice my objection to Segment J4 of the proposed RAMHORN
37 HILL — DUNHAM 345 kV TRANSMISSION LINE PROJECT. Additionally, it is to provide my expert
38 testimony and identify the facts, law or policy I consider at issue.

39
40 **IV. IDENTIFICATION OF THE FACT, LAW OR POLICY AT ISSUE**

41 Q. WHAT FACT IS AT ISSUE?

42 A. I believe that Bishop Park contains environmentally sensitive areas that need to be considered
43 and potentially protected and preserved. Bishop Park's natural environment has been preserved
44 to enhance the City's distinctive community character and quality of life consistent with the
45 community's vision and values. Additionally, I believe portions of Bishop Park are in a designated
46 flood plain and soil, habitats, and vegetation would all be impacted by the powerlines. Finally,
47 there are additional concerns about bird mortalities associated with bird/power line
48 electrocutions and collisions.

49
50 Q. WHAT ADDITIONAL FACT IS AT ISSUE?

51 A. Based on my years of experience in real estate and multiple studies on the topic, properties
52 within 1,250 feet of high intensity power lines experience reduced property and leasing values.
53 That is a result of a number of factors, including health concerns about exposure to
54 electromagnetic fields ("EMFs"), the aesthetics of the power poles and lines, impacts on quality
55 of life and finally safety concerns, such as during extreme weather events like Winter storms,
56 wind storms and tornados, which could lead to powerline damage or failures. This will result in
57 a direct negative economic impact to the JTS project and my investment in JTS 3.8, LLC.

58
59 Q. WHAT POLICY IS AT ISSUE?

60 A. I believe that Oncor is not complying with the Commission's Policy of Prudent Avoidance as
61 defined under 16 TAC § 25.101. Prudent avoidance is defined as "the limiting of exposures to
62 electric and magnetic fields that can be avoided with reasonable investments of money and
63 effort." My understanding of the Commission's policy of prudent avoidance is that the process of
64 routing a proposed transmission line should include consideration of routing options that will
65 reasonably avoid population centers and other locations where people gather. This does not
66 mean that a proposed transmission line must avoid habitable structures at all costs, but that
67 reasonable alternatives should be considered and selected. JTS considered as a whole, and
68 specifically the proposed Event Center as show on attached Exhibit "A" in relation to Segment J4
69 shown on Exhibit "B", will be locations where significant numbers of people will gather. That is
70 the entire point of JTS and the event center concept. It is intended to be a community gathering
71 place where people can shop and community festivals can be held, such as arts and craft fairs,
72 holiday festivals and the fire department's fish fry. With that in mind, there are routing options
73 to the south of Segment J4 that will avoid population centers and where people gather,
74 therefore Oncor's consideration of using Segment J4 does not comply with the Policy.

75
76
77 **VI. CONCLUSIONS**

78 Q. DOES THIS CONCLUDE YOUR DIRECT TESTIMONY?

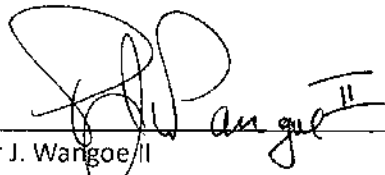
79 A. Yes, it does.
80

AFFIDAVIT

STATE OF TEXAS §
 §
COUNTY OF TARRANT §

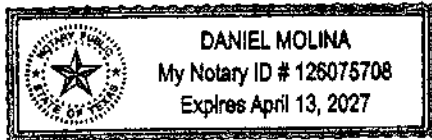
BEFORE ME, the undersigned authority, on this day personally appeared Peter J. Wangoe II, who having been placed under oath by me, did depose as follows:

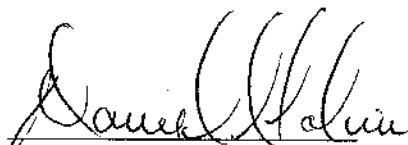
My name is Peter J. Wangoe II. I am of legal age and a resident of the State of Texas. The foregoing testimony and exhibits offered by me are true and correct, and the opinions stated herein are, to the best of my knowledge and belief, accurate, true and correct.



Peter J. Wangoe II

SUBSCRIBED AND SWORN TO BEFORE ME on this 31st day of July, 2023.





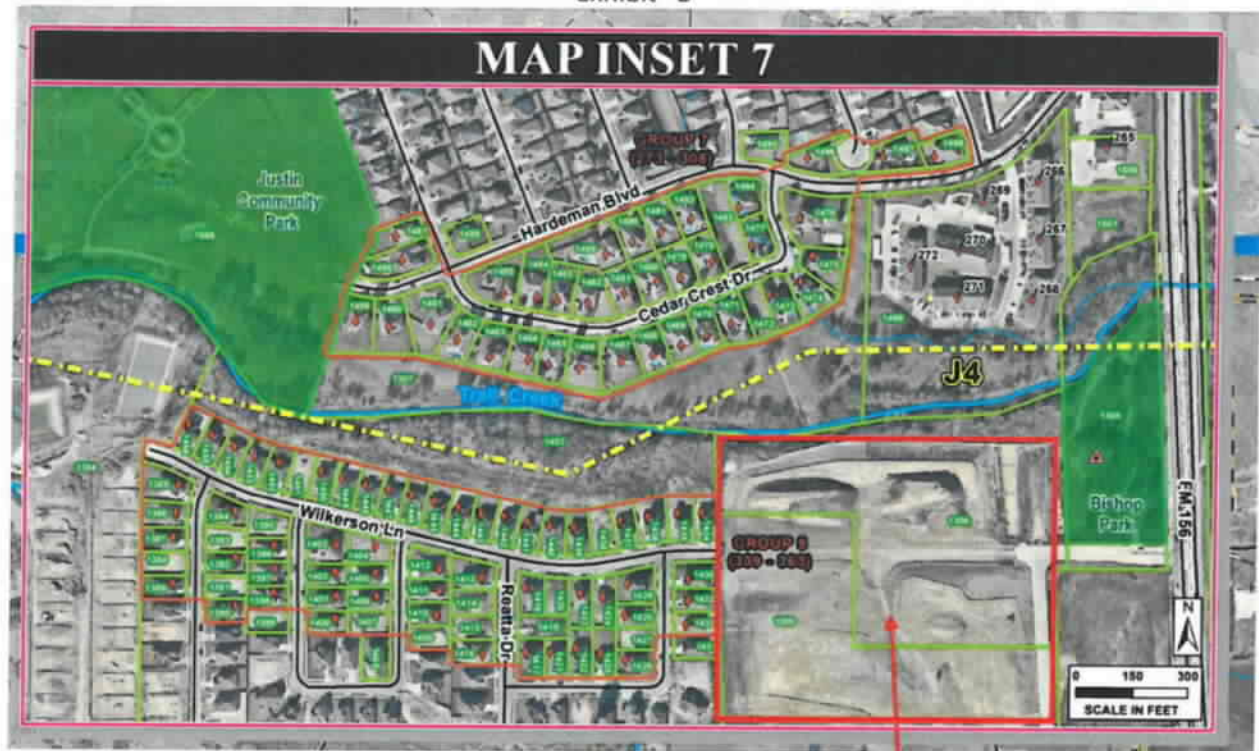
Notary Public, State of Texas

My Commission Expires

APRIL 13, 2027

Exhibit "A"





Justin Town Square Project