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**SOAH DOCKET NO. 473-23-21216
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APPLICATION OF ONCOR	§	BEFORE THE STATE OFFICE
ELECTRIC DELIVERY COMPANY	§	
LLC TO AMEND ITS	§	
CERTIFICATE OF CONVENIENCE	§	OF
AND NECESSITY FOR THE	§	
RAMHORN HILL - DUNHAM 345-	§	
KV TRANSMISSION LINE IN	§	
DENTON AND WISE COUNTIES	§	ADMINISTRATIVE HEARINGS

**TODD FAMILY HOLDINGS L.P.'S
STATEMENT OF POSITION**

TO THE HONORABLE ADMINISTRATIVE LAW JUDGE ("ALJ"):

Todd Family Holdings L.P. ("Todd Family Holdings") files this Statement of Position in accordance with SOAH Order No. 2, and respectfully shows the following:

1. Todd Family Holdings Supports Proposed Route 179. Route 179, as set forth in Oncor Electric Delivery Company LLC ("Oncor") Application for the Ramhorn Hill-Dunham 345-kV Transmission Line in Denton and Wise Counties Project ("Ramhorn Hill-Dunham Project"), satisfies best among the routing options the criteria the ALJ and the Commission must evaluate in determining the route the Ramhorn Hill-Dunham Project must traverse. Todd Family Holdings, therefore, supports approval of the Ramhorn Hill-Dunham Project on an alignment that includes Links A0-A4-B1-B61-B62-C1-C21-C23-C7-E2-E1-E6-G1-G3-H41-H42-H8-I8-J3-K1-L5-L4-L3-L2-M1-M2-M3-R4-V2-Z.

2. Opposition to Routes Including Link V3. Although the land Todd Family Holdings owns would also be adversely affected by any route that includes Links U3, V1, or W5, Todd Family Holdings opposes any route that includes Link V3, because it is the most destructive of any use of the land:

a. Todd Family Holdings' affected land consists of approximately 12 acres of land that is undeveloped, other than by an operating natural gas well, and

is designated as Tract 2544 in the Application. The Todd Family Holdings land fronts U.S. 287/U.S. 81 for approximately 1,800 feet and is located within a thriving area of commercial and residential development—directly across U.S. 287/81 from a large residential neighborhood currently under development by PMB Rolling V Land LP, an intervenor in this case, “Reunion Texas.” See <https://reuniontx.com/>. The Todd Family Holdings land is depicted in the following diagram, Figure 1, extracted from the as-filed Application, Attachment 1, Environmental Assessment, Appendix H, Figure 3-1A. Reunion Texas includes Tracts 2561, 2562, 2563, 2563.2, 2564, 2570, 2571, 2572, 2573, 2574, 2575, 2579, as set forth in the Application, Attachment 8, Listing of Directly Affected Land Owners for Notice.



Figure 1. Excerpt from Oncor Application, Att. 1, Appx. H, Figure 3-1A.

b. As is clear from Figure 1, Link V3 bisects the Todd Family Holdings land in a dog-leg pattern that renders it substantially unusable for most commercial or residential purposes. If Link V3 were routed south of the operating gas well, the Todd Family Holdings land would be far more usable than most any other configuration, although commercial and residential uses would still be substantially diminished.

c. Link V3 also bisects Tract 2561 and enters Tract 2563, each part of Reunion Texas.

d. Routes using Link V2, rather than Link V3, will not only avoid the Todd Family Holdings land, they will avoid bisecting the currently-under-construction Reunion Texas residential neighborhood.

3. Positive Attributes of Route 179. As Oncor Witness Brenda J. Perkins has testified, Route 179 best meets the criteria the ALJs and the Commission must consider under TEX. UTIL. CODE § 37.056(c)(4)(A)-(D) and 16 TEX. ADMIN. CODE § 25.101(b)(3)(B), for the following reasons, among others:

a. Route 179 is approximately 21.8 miles in length. As such it is only approximately 1.9 miles longer than the shortest route provided in the Application, and is approximately 1.1 miles shorter than the longest route filed.

b. Route 179's estimated cost is \$175,208,000. It is, therefore, more than 35% less costly than the highest cost filed alternative route. Perhaps more importantly, Route 179's estimated cost is only approximately 6.5% more costly than the least-cost filed alternative route.

c. Oncor witnesses have testified that all of the filed alternative routes meet the Commission's policy of prudent avoidance. Route 179, however, performs extremely well under that policy, in that it passes only 97 habitable structures within 500 feet of its centerline. By comparison, Route 179 passes only four more habitable structures than the filed route with the least habitable structures within 500 feet of the proposed line's centerline.

More, Route 179 passes 303 fewer habitable structures than the filed alternative route passing the most.

Overall, Route 179 compares favorably to all other routes in meeting the criteria the ALJs and the Commission must evaluate. See Direct Testimony of Brenda J. Perkins at 8-12 and Exhibit BJP-5; see also Application, Att. 1, Environmental Assessment, Appx. E, Att. 7, Table 7-2 (Environmental Data for Filed Routes) and Att. 3 (Cost Estimates), each of which is incorporated herein by reference as if fully set forth.

6. Conclusion and Prayer. For the above-stated reasons, Todd Family Holdings respectfully requests that the Commission approve Route 179, as set forth in the Application; or, alternatively, not select a route including Link V3; and grant Todd Family Holdings such other and further relief to which it may be justly entitled.

Respectfully submitted,

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CERTIFICATE OF SERVICE

I certify that a copy of this document is being filed and served on this, the 31st day of July, 2023, in the Public Utility Commission of Texas's Interchange System in accordance with the orders of the presiding officer, SOAH Order No. 2.

/s/ David F. Brown
David F. Brown