



## **Filing Receipt**

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PUC DOCKET NO. 55067**

<b>APPLICATION OF ONCOR ELECTRIC</b>	<b>§</b>	<b>BEFORE THE STATE OFFICE</b>
<b>DELIVERY LLC TO AMEND ITS</b>	<b>§</b>	
<b>CERTIFICATE OF CONVENIENCE</b>	<b>§</b>	
<b>AND NECESSITY FOR THE</b>	<b>§</b>	<b>OF</b>
<b>RAMHORN HILL - DUNHAM 345 KV</b>	<b>§</b>	
<b>TRANSMISSION LINE IN DENTON</b>	<b>§</b>	
<b>AND WISE COUNTIES</b>	<b>§</b>	<b>ADMINISTRATIVE HEARINGS</b>

**ALLIANCE WEST, LP'S STATEMENT OF POSITION**

TO THE PUBLIC UTILITY COMMISSION OF TEXAS:

Alliance West, LP, (Alliance) files this Statement of Position pursuant to the procedural schedule adopted by the Administrative Law Judges (ALJs) in State Office of Administrative Hearings (SOAH) Order No. 2, and in support thereof would respectfully shows:

**I. BACKGROUND**

On June 8, 2023, Oncor Electric Delivery LLC (Oncor) filed its application to amend its certificate of convenience and necessity for the Ramhorn Hill to Dunham 345 kV transmission line (Transmission Line) in Denton and Wise Counties (Application). Pursuant to SOAH Order No. 2, intervening parties are required to file a statement of position or direct testimony on or before July 31, 2023. Therefore, this Statement of Position is timely filed.

**II. STATEMENT OF POSITION**

Alliance is the owner and developer of property identified by Oncor in its Application as directly affected by proposed segments "M1," "M2," "M4," and "M5" of the Transmission Line.<sup>1</sup> The ranch property in question has been under the same owner for almost 100 years. As a result, and for the reasons stated below, Alliance is opposed to any route utilizing route segments M1, M2, M4, or M5 as currently proposed by Oncor in this proceeding.

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<sup>1</sup> *Application of Oncor Electric Delivery LLC to Amend Its Certificate of Convenience and Necessity for the Ramhorn Hill - Dunham 345 kV Transmission Line in Denton and Wise Counties*, Docket No. 55067, Application Attachment 8, Listing of Directly Affected Land Owners for Notice at 140 (Jun. 8, 2023).

### **Opposition to Route Segments M1 and M2**

Alliance opposes the above route segments because they bisect Alliance's property and would materially and adversely impact the development of valuable business interests in and around the property and would cause substantial damage to the economic and developmental value of the property and the surrounding area. While the property is currently undeveloped, its location makes it highly valuable for future multi-family development. Constructing Segments M1 or M2 on Alliance's property as proposed by Oncor would stifle future development, render Alliance's existing engineering and land use development plans virtually worthless, and would require Alliance to reengineer the platting and development of the property to avoid the placement of the Transmission Line, which is substantially detrimental to Alliance as well as surrounding developers and landowners in terms of time, resources, and cost.

Further, the proposed M1 and M2 segments appear to be aligned directly over existing natural gas pipelines and existing transmission facilities currently located on the property, which indicates that the proposed placement of those segments is not a viable option. This also introduces uncertainty in the construction phase as Oncor may be forced to deviate from the M1 and M2 segment locations as proposed. This uncertainty regarding the final location of the M1 and M2 segments introduces the potential for further delays, significant costs associated with reengineering and platting the development of the property, and calls into question the accuracy of the cost estimates Oncor has provided to build those route segments.

### **Opposition to Route Segments M4 and M5**

In addition to the arguments stated above regarding route segments M1 and M2, public infrastructure improvements planned for the area, including new road access, are part of the overall development plans at the location of the proposed M4 and M5 route segments. The inclusion of those segments in the approved route would adversely impact Alliance and its plans for the property as the Transmission Line would result in lost access points to the property and an overall reduction of the area that is capable of being developed. Further, the adverse land use impact and resulting economic loss that would result from the placement of the Transmission Line on the proposed M4 and M5 segments would be significant from an investment perspective, including but not limited to lost square footage, significant division of the property and the resulting inefficiency of infrastructure, and a significant reduction in the attractiveness of the commercial development to potential tenants due to necessary adjustments that will have to be made to account

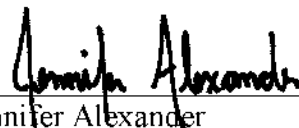
for the existence of the Transmission Line in Alliance's original initial siting and concept plan already being developed at significant expense.

Alliance also opposes route segments M4 and M5 because they have a similar adverse impact to additional property owned by Alliance. In particular, the proposed M4 and M5 route segments cross Alliance property that has an approved preliminary plat. The final plat is being reviewed by the City of Fort Worth and Alliance expects approval of the final plat on November 1, 2023, well in advance of any final approval of the Transmission Line route by the Commission in this proceeding. Consequently, if segments M4 and M5 are ultimately included in the route approved by the Commission, a final plat will have already been approved by the City of Fort Worth prior to the Commission's decision.

### **III. CONCLUSION**

For the reasons detailed above, Alliance opposes the construction of the transmission line along route segments M1, M2, M4, or M5 and consequently opposes all routes that include those segments. Alliance reserves its right to participate in this proceeding, including conducting discovery, participating in the hearing on the merits, and to take positions based on information presented at the hearing or in briefing.

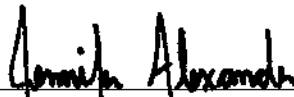
Respectfully submitted,

A handwritten signature in black ink, appearing to read "Jennifer Alexander", is written over a horizontal line.

Jennifer Alexander  
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**CERTIFICATE OF SERVICE**

I certify that a copy of this document was served on all parties of record on this date via the Commission's Interchange in accordance with the Commission's Second Order in Docket No. 50664 suspending PUC Procedural Rule 22.74.

  
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Jennifer Alexander