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SOAH DOCKET NO. 473-23-21216

PUC DOCKET NO. 55067

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

DIRECT TESTIMONY OF EDGAR BRENT WATKINS, AS CO-TRUSTEE OF THE WATKINS FAMILY TRUST, AND ON BEHALF OF MARY ANN LIVENGOOD, AS CO-TRUSTEE OF THE WATKINS FAMILY TRUST

Intervenor Edgar Brent Watkins, as Co-Trustee of the Watkins Family Trust, and on behalf of Mary Ann Livengood, as Co-Trustee of the Watkins Family Trust, files the attached Direct Testimony. Intervenor agrees and stipulates that this Direct Testimony can be treated by all parties as if the answers were filed under oath.

Respectfully Submitted,

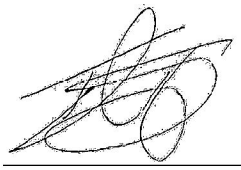
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ATTORNEYS FOR INTERVENOR

CERTIFICATE OF SERVICE

I certify a copy of this document is being filed in the Public Utility Commission's Interchange System and served on all parties of record as required by orders in this docket, the Commission's rules, and the Commission's First and Second Orders Suspending Rules issued on March 16, 2020 and July 16, 2020, in Project No. 50664.



Tyler Topper

SOAH DOCKET NO. 473-23-21216
PUC DOCKET NO. 55067

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

DIRECT TESTIMONY

of

EDGAR BRENT WATKINS, AS CO-TRUSTEE OF THE WATKINS FAMILY TRUST, AND ON BEHALF OF MARY ANN LIVENGOOD, AS CO-TRUSTEE OF THE WATKINS FAMILY TRUST

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I. INTRODUCTION

Q. Please state your name and address.

A. My name is Edgar Brent Watkins and my wife's name is Mary Ann Livengood a/k/a Ann L. Watkins. We are Co-Trustees of the Watkins Family Trust. Our mailing address is PO Box 112, Rhome, Texas 76078, and our physical address is 2076 Ramhorn Hill Road, Rhome, Texas 76078.

Q. Please describe your background, profession and/or experience.

A. I received an Associate of Arts degree from Tarrant County Community College in 1981 with a focus on Civil Engineering. I later attended Texas Christian University from 1999-2001with a focus in Information Science. I retired from Lockheed Martin February 28, 2020. I was an Engineer and IT Specialist at Lockheed Martin for thirty-eight years. Prior to working at Lockheed Martin I was employed as a Civil Engineer at a steel fabricating company for seven years. My wife, Ann is also retired. She received a Bachelor of Science in Interior Design from Texas Christian University in 1978. She previously worked at Lockheed Martin for fifteen years as an Engineer.

Q. Have you ever participated or testified in another proceeding before the Public Utility Commission of Texas ("PUC")?

A. No.

Q. On whose behalf are you testifying?

A. I am testifying as Co-Trustee of the Watkins Family Trust ("the Trust") and on behalf of my wife as the other Co-Trustee of the Trust.

Q. Can you describe your interest in SOAH Docket No. 473-23-21216 and PUC Docket No. 55067.

A. We intervened in this proceeding as potentially affected landowners. The Trust owns property in Wise County which might be impacted by the transmission line proposed to be built by Oncor Electric Delivery Company, LLC ("Oncor") in this docket (the "Property").

Q. Briefly describe your ownership history in the affected property.

A. The Property has been in our family for many generations and was passed down to the Trust through gift deed in 1998.

II. PURPOSE OF TESTIMONY

Q. What is the purpose of your testimony?

A. The purpose of our testimony is to: (i) describe the Trust's property; (ii) describe the expected impact of the proposed transmission line on the Trust's property; (iii) voice our opposition against certain links and routes; and (iv) provide information on the route that we prefer.

Q. Is the information contained in your testimony true and correct to the best of your knowledge and belief?

A. Yes, it is.

III. DESCRIPTION OF THE PROPERTY AND IMPACT OF THE TRANSMISSION LINE ON THE PROPERTY

Q. Please describe your property.

A. The Trust owns approximately 117 contiguous acres in Wise County, which will be impacted by the proposed transmission line, if any route utilizing Link V2 is approved by the PUC. The properties have been identified by Oncor as Tracts 2553, 2554, and 2555 and are depicted on Exhibit "A" attached to our testimony.

Q. Are there any habitable structures or other improvements on your property?

A. There is a house on the Property, which is our home, and a barn. Additional improvements include a water well, fencing, a nice driveway, and a refurbished windmill. Our home is labeled as Habitable Structure No. 993 on Tract 2553. Rather than running along our property line, Proposed Link V2 would run through the middle of our property, across the middle of our driveway and in very close proximity to our home and our barn. An aerial image of our property using Oncor's GIS data to provide a more detailed depiction of how the proposed transmission line would cross our property is attached as Exhibit "B".[1]

Q. Please describe your Property's terrain and any ecological features.

A. The terrain consists of rolling prairie land with small hills and pasture grass, and sparse trees throughout. There is a stock pond and a small creek on the Property. Numerous species of wildlife such as deer, coyote, turkey, skunk, raccoon, lizard and various birds inhabit the Property. We also have several threatened species of plants and animals (according to Texas Parks and Wildlife) on the Property including the Texas garter snake, American bumblebee, Topeka purple coneflower and Comanche peak prairie clover. The fences on the Property allow for wildlife to move about freely.

1 *See* Oncor's Response to Watkins' 1st RFIs, Question 1-01; Docket Item No. 342.

Q. Have you undertaken any efforts to restore the property or environmental quality of the property?

A. Yes. We've planted numerous native plants, as well as buffalo grass on the Property.

Q. Please describe the Property's current uses and operations.

A. The Property is our homestead and is also leased for cattle grazing. There is also a gas well located at the rear of the property.

Q. Are there planned future uses of the property that are different from the current use(s)? If so, please explain.

A. Not at this time, although that is subject to change based on unforeseen events.

Q. Are there any existing transmission lines located on the Property?

A. No.

Q. Do you believe the transmission line route should parallel property lines or other compatible rights-of-way?

A. Absolutely. Segment V2 in particular is abysmal at paralleling anything. In fact, based on the segment information provided by Oncor, Segment V2 has absolutely zero feet of its length paralleling anything at all.[2] This means that every landowner along Segment V2 would have the transmission line through the middle of their properties instead of along property lines. I think it is important to many members of the community, not just my wife and I, to parallel property lines or other compatible rights-of-way, and we consider this an important community value issue.

Q. Do you believe there are any better options with regard to paralleling property lines and other existing compatible rights-of-way than using Segment V2?

A. Yes. I believe there are other routes with similar costs and other characteristics that parallel property lines and other existing compatible rights-of-way much better than Route 179. I also believe that the paralleling characteristics of any route utilizing Segment V2 could be easily and substantially enhanced at a de minimus cost by substituting the use of Segments V1-V3-V4 for Segment V2.

Q. How would the substitution of Segments V1-V3-V4 for Segment V2 enhance the paralleling attributes of any route utilizing Segment V2?

2 *See* Oncor's Response to DHL Supply Chain's 1st RFIs, Question 1-03; Docket Item No. 167.

A. Based on the routing information provided by Oncor, Segments V1-V3-V4 have a combined total length of 8,391 feet while Segment V2 is longer at 9,114 feet. Segments V1-V3-V4 parallel railroads for 4,261 feet, parallel existing public roads/highways for 1,149 feet, parallel apparent property boundaries for 4,261 feet and have a total length of route parallel to existing compatible rights-of-way of 4,261 feet, or 50.8% of these segments' combined length. In sharp contrast, Segment V2 parallels nothing at all (0% of its length).[3]

Q. If the transmission line is built on the Property, do you have any concerns about Oncor having access to the Property?

A. Yes, we have the general concerns of landowners who are required to give third parties access to their property, especially so close to our home. More specifically, we are concerned about Oncor and its subcontractors driving heavy equipment on and across our private driveway and grazing areas, as well as the loss of privacy we will experience at our home.

Q. If the transmission line is built on the Property, do you have any other concerns?

A. We are seriously concerned with the potential devaluation to the Trust's Property as a result of this proposed line. Our understanding is that there is a planned State Highway 81/287 expansion that will impact us beginning in 2026. This expansion will widen the current divided highway and reconstruct the access roads that border a portion of our east property line. We understand that TxDOT plans to install a bridge and create a new interchange at the intersection of Ramhorn Hill Road and Hwy 81/287. A copy of TxDOT's project schematic is attached as Exhibit "C" and an excerpt from TxDOT's public hearing presentation regarding the project is attached as Exhibit "D".[4] TxDOT's planned bridge will eventually link our property with the Alliance Airport area and other Mid-Cities toward Dallas. By extending Eagle Parkway in the Alliance area west to link up with Ramhorn Hill Road, our road would then become an extension of Eagle Parkway connecting Alliance Airport with the Eagle Mountain Lake area, thus making our corner extremely valuable located at this major crossroad. Attached as Exhibit "E" is an excerpt

3 *See Id.*

4 The complete schematic and public hearing presentation are publicly available on TxDOT's website at: https://www.txdot.gov/projects/hearings-meetings/fort-worth/us81us-287-rhome.html.

from the City of Fort Worth's Master Thoroughfare Plan depicting Ramhorn Hill Road's connection to Eagle Parkway.[5] A transmission line along V2 would likely devastate the value of the Property as it stands today, and may have an even greater detrimental effect on the value if and when the proposed roadway projects are eventually realized. In addition to our devaluation concerns, we are also concerned with the potential negative impact a transmission line could have on the cattle grazing operations. Further, we are concerned about the health and safety issues potentially associated with transmission lines, especially since we live on the Property, and people and animals would consistently be in close proximity to the proposed line. Finally, we are concerned with the negative impact the line would have on the aesthetics of the Property and the potential for noise interference from the line. Please note that we understand long-term roadway planning projects are subject to change and that we are not experts on property valuation or medical issues; our comments merely reflect our personal concerns.

IV. CONCLUSIONS AND RECOMMENDATIONS

Q. Please summarize your position in this proceeding regarding Oncor's proposed alternative routes.

A. We are very opposed to the use of Link V2, and any route utilizing the same (i.e., Routes 22, 29, 116, 130, 132, 164, and 179). We support any other route that does not use Link V2.

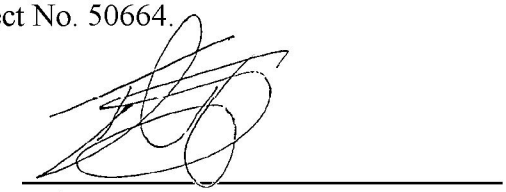
Q. Does this conclude your testimony?

A. Yes, that concludes my testimony, subject to subsequent correction.

5 The complete City of Fort Worth Master Thoroughfare Plan is publicly available on the City of Fort Worth's website at: https://www.fortworthtexas.gov/departments/tpw/mtp.

CERTIFICATE OF SERVICE

I certify a copy of this document is being filed in the Public Utility Commission's Interchange System and served on all parties of record as required by orders in this docket, the Commission's rules, and the Commission's First and Second Orders Suspending Rules issued on March 16, 2020 and July 16, 2020, in Project No. 50664.



Tyler Topper

EXHIBIT "A"

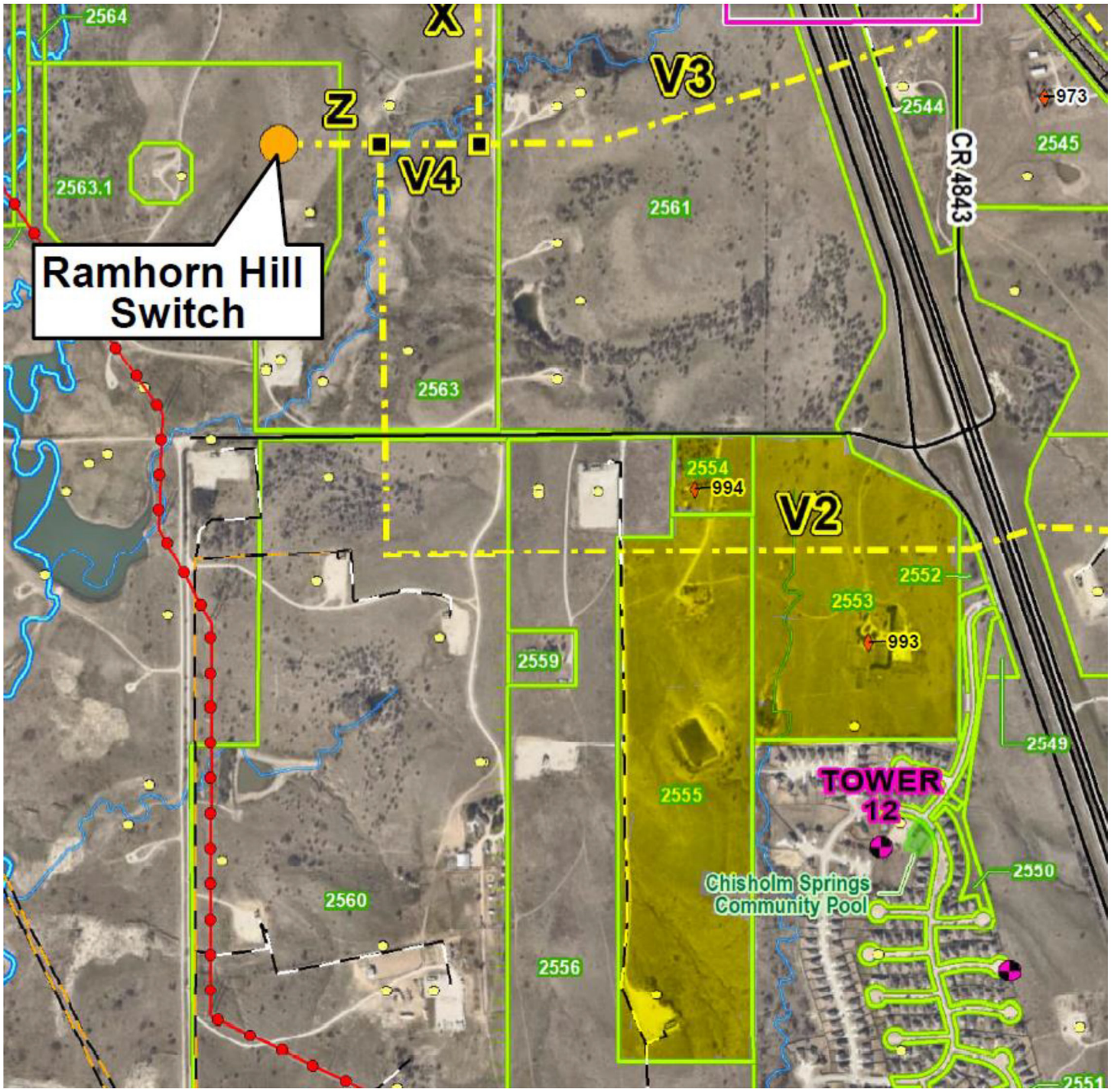

2564
X
V3
Z
V4
2544
973
2545
CR4843
2563.1
2561
Ramhorn Hill Switch
2563
2554
994
V2
2552
2553
993
2559
2549
TOWER 12
2555
2550
Chisholm Springs Community Pool
2560
2556
2551

EXHIBIT "B"

ROLL 4 OF 6

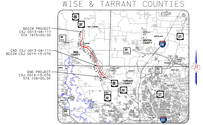
Texas Department of Transportation

FORT WORTH DISTRICT

DAVID M. SALAZAR, P.E.
DISTRICT ENGINEER

MAY 16, 2023
PUBLIC HEARING DISPLAY
US 81/US 287

FROM NORTH OF PIONEER ROAD
TO SOUTH OF AVONDALE-HASLET ROAD
CSJ# 0013-08-111, 2014-15-076
PROJECT LENGTH: 9.96 MILES
WISE & TARRANT COUNTIES



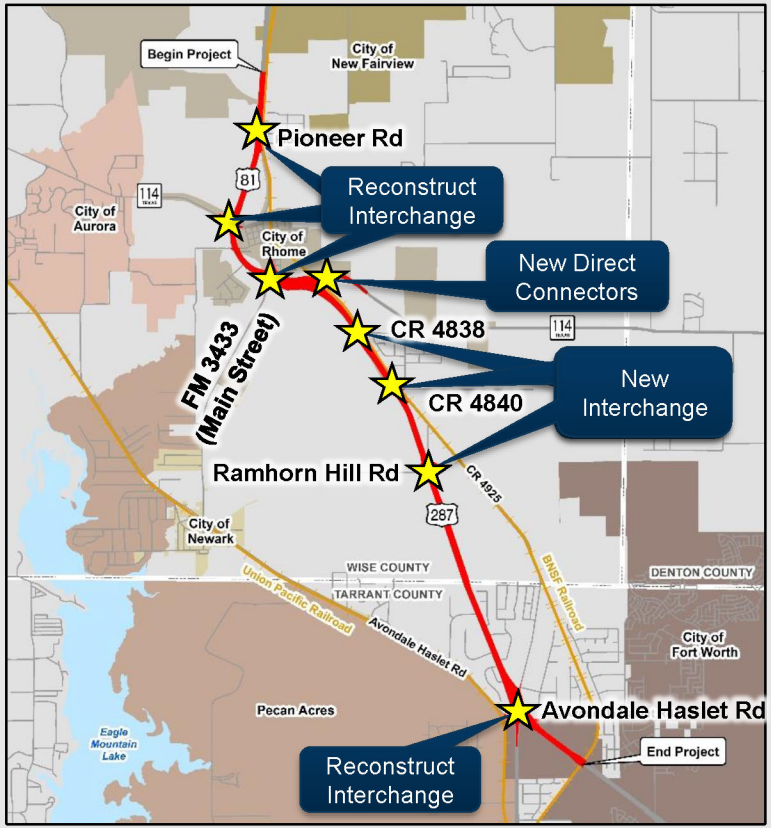
PROJECT LOCATION MAP
NOT TO SCALE

PROJECT LIMITS (0013-08-111 + 2014-15-076)

BEGIN CSJ 0013-08-111	STA 1567+00.00	
	0.00 MI	BEGIN PROJECT
	0.00 MI	BEGIN CSJ 2014-15-076
	0.00 MI	BEGIN CSJ 0013-08-111
	0.00 MI	BEGIN BRIDGE
	0.00 MI	BEGIN RAMP
	0.00 MI	BEGIN DIVIDED
	0.00 MI	BEGIN CONCRETE PAVEMENT
	0.00 MI	BEGIN CURB & GUTTER
	0.00 MI	BEGIN CONCRETE MEDIAN
	0.00 MI	BEGIN RETAINING WALL
	0.00 MI	BEGIN SIDEWALK
	0.00 MI	BEGIN SHARED USE PATH
	0.00 MI	BEGIN ACCESS DENIAL
	0.00 MI	BEGIN RIGHT-OF-WAY
	0.00 MI	BEGIN RAILROAD
	0.00 MI	BEGIN OVERHEAD SIGN
	0.00 MI	BEGIN ILLUMINATION
	0.00 MI	BEGIN SIGNAL
	0.00 MI	BEGIN SIGNAL & ILLUMINATION

Proposed US 81/US 287 Roadway – Interchanges

Exhibit "D"



- Reconstruct interchanges at Pioneer Road, SH 114 West, FM 3433 (South Main Street) and Avondale Haslet Road
- SH 114 East improvements including direct connectors and frontage roads
- Construct new overpasses at County Road 4840 and Future Northstar Parkway and a new underpass at Ramhorn Hill Road

Exhibit "E"

Street Type Map

