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

DIRECT TESTIMONY OF TOMMY CANSLER

ON BEHALF OF

INTERVENOR TCCI RANGE – MEAD 2021 LLC

July 31, 2023

I. INTRODUCTION OF WITNESS AND PURPOSE OF TESTIMONY

1 **Q. Please state your name and business address.**

2 A. My name is Tommy Cansler. My business address is 14675 Dallas Parkway, Suite 575,
3 Dallas, Texas 75254.

4 **Q. By whom are you employed?**

5 A. I am employed as President of TCCI Land Development, Inc. ("TCCI Land
6 Development"), which is the Manager of TCCI Range – Mead 2021 LLC ("TCCI Range –
7 Mead").

8 **Q. Please describe TCCI Range - Mead and its business.**

9 A. TCCI Range - Mead is a real estate development company with offices in Dallas, Texas.
10 TCCI Range - Mead acquires and develops urban and suburban residential and commercial
11 properties in and around the Dallas / Fort Worth metroplex area.

12 **Q. What is your title at TCCI Range - Mead?**

13 A. I am the President and the Manager of TCCI Range - Mead.

14 **Q. Please describe your duties as President of the Manager of TCCI Range - Mead.**

15 A. I oversee the acquisition, entitlements, and development of TCCI Range - Mead's
16 residential and commercial properties in Texas.

17 **Q. Please describe briefly your employment background.**

18 A. I have over 30 years' experience in civil engineering and in the acquisition, entitlement,
19 and development of residential and commercial real estate in the Dallas / Fort Worth
20 metroplex and surrounding areas.

21 **Q. What is the purpose of your testimony in this docket?**

1 A. I am providing testimony to describe the residential development that TCCI Range - Mead
2 is in the process of developing on a tract of land located near the City of Justin in Denton
3 County, Texas. One of the transmission line routes proposed by Oncor Electric Delivery
4 Company, LLC ("Oncor") in this docket would cross the tract that TCCI Range - Mead is
5 developing and would reduce the area on which the homebuilder to which TCCI Range -
6 Mead sells such property can build homes.

7 **Q. What relief does TCCI Range - Mead seek in this docket?**

8 A. TCCI Range - Mead requests that the Public Utility Commission of Texas ("Commission")
9 approve one of Oncor's alternative proposed transmission line routes that utilize links J22
10 and L1. It is my understanding that Route 58 is composed of the following links: I6-J1-
11 J21-J22-L1-L2, which based on my understanding of the standards the Commission uses
12 to evaluate line suitability and the geographic area for the proposed line would be the least
13 disruptive for development. In the alternative, TCCI Range - Mead requests that the
14 Commission approve another route.

II. DESCRIPTION AND INTENDED USE OF TCCI RANGE - MEAD PROPERTY

Q. Please describe the property on which TCCI Range - Mead is developing for residential housing.

A. The property, which I will refer to as the "Core Property," is a 538.99-acre tract located in Denton County, Texas, outside of the City of Justin. It is located at the western terminus of Range Road, west of Boss Range Road.

Q. How long as TCCI Range - Mead owned the Core Property?

A. On November 19, 2021, TCCI Range - Mead purchased the Core Property from the Estate of Joan Nanette Mead, Larry Range and Oscar Range. TCCI Range - Mead is now the sole owner of the Core Property.

Q. Why did TCCI Range - Mead buy the Core Property?

A. TCCI Range - Mead acquired the Core Property as a site to develop single-family homes. The development is intended to appeal to persons and families who want to live in a stand-alone residence. The community will have two amenity centers, parks, playgrounds, and numerous other amenities.

Q. How many residences does TCCI Range - Mead intend to build on the Core Property?

A. TCCI Range - Mead has created a design plan that will allow it to build 1,608 single-family homes on the Core Property. Approximately three-quarters of the homes will be located south of a small area of flood plain in the norther portion of the Core Property, and the remaining homes will be located north of that same flood plain. Both amenity centers will be located south of the flood plain.

Q. Does TCCI Range - Mead intend to continue owning and operating the development after it is built?

1 A. No. TCCI Range - Mead is currently in negotiations with a national homebuilder to sell
2 the Core Property.

3 **Q. Will the development on the Core Property add to the tax base of Denton County and**
4 **the City of Justin?**

5 A. Yes. Taxes from the development will support Denton County, the City of Justin, and the
6 local school districts.

7 **Q. Has TCCI Range - Mead discussed the planned community with representatives of**
8 **the City of Justin?**

9 A. Yes. Justin officials are supportive of the project. TCCI Range – Mead has already entered
10 into a wastewater agreement with the City of Justin in which TCCI Range – Mead has
11 committed to providing \$2,000,000.00 to be a part of such agreement, and has submitted a
12 processing development agreement with the City of Justin that is expected to approved in
13 approximately 90 days.

III. EFFECT OF ONCOR TRANSMISSION LINE ON CORE PROPERTY

1 **Q. Are you aware that Oncor has proposed a 345-kilovolt (“kV”) transmission line in the**
2 **vicinity of the Core Property?**

3 A. Yes. TCCI Range - Mead learned of Oncor’s plan to construct a transmission line and
4 substation in the vicinity after receiving notice from the Public Utility Commission in July
5 of 2023.

6 **Q. Does the proposed Oncor transmission line have the potential to affect the Core**
7 **Property?**

8 A. Yes. The proposed transmission lines cross directly through the proposed housing
9 subdivisions in the northern and southern portions of the Core Property, which would lead
10 to substantial alterations of the plat that has been approved by the City of Justin.

11 **Q. If the Commission were to select the route that crosses the Core Property, how would**
12 **it affect TCCI Range - Mead’s plans to develop the property?**

13 A. It is my understanding that Oncor will require a 70-foot easement for the four transmission
14 lines, and the easements would run throughout the southern, middle and norther portions
15 of the Core Property if the Commission were to select Oncor’s currently recommended
16 route—Route 179. Because TCCI Range - Mead cannot build on the transmission line
17 right-of-way, siting the transmission lines throughout the Core Property would require
18 TCCI Range - Mead to alter its entire development and lead to the loss of at least 192
19 housing plots and the alteration or removal of one of the amenity centers on the Core
20 Property.

21 **Q. Would placing the transmission line have any other detrimental effects on the Core**
22 **Property and TCCI Range - Mead?**

1 A. Yes. Having the four transmission lines running throughout the Core Property would make
2 TCCI Range – Mead have to completely revise its development plans, require TCCI Range
3 – Mead to resubmit the development plans to the City of Justin, and dramatically affect the
4 sales price of the Core Property. In addition, having the four transmission lines running
5 throughout the development would make the homes in the Core Property a less attractive
6 place for potential residents, many of whom would prefer not to live right next to a
7 transmission line. Thus, not only would the lines reduce the number of homes available to
8 build, but it would also make it harder to sell the homes that are built in the Core Property
9 development.

10 **Q. If having transmission lines on the Core Property reduces the value and attractiveness**
11 **of that property, doesn't that same argument apply to all other potentially affected**
12 **landowners in the City of Justin area?**

13 A. Yes. I realize that other landowners in the area have the same concerns about the effect
14 that the proposed Oncor transmission line may have on the value of their properties. That
15 is why almost no one wants a transmission line on or near their property, and why these
16 transmission line cases present hard choices for the Commission. Regardless of how the
17 Commission decides this case, some landowners will be disappointed. Given the
18 impossibility of approving a route that will make everyone happy, I recommend that the
19 Commission focus instead on routes that make the most sense economically. I will discuss
20 those routes in the next section of my testimony.

IV. ALTERNATIVE ROUTES FOR THE ONCOR TRANSMISSION LINE

1 **Q. Have you analyzed the alternative routes that Oncor has proposed for the**
2 **transmission line?**

3 A. Yes, at a high level. I have studied the maps showing the various alternative routes that
4 Oncor has proposed.

5 **Q. Has Oncor selected a preferred route?**

6 A. Yes. It is my understanding that Oncor's preferred route is Route 179, which consists of
7 the following links: A0-A4-B1-B61-B62-C1-C21-C23-C7-E2-E1-E6-G1-G3-H41-H42-
8 H8-I8-J3-K1-L5-L4-L3-L2-M1-M2-M3-R4-V2-Z.

9 **Q. Does TCCI Range - Mead agree with Oncor's selection of Route 179 as the preferred**
10 **route?**

11 A. No. As noted in the Direct Testimony of Brenda J. Perkins on behalf of Oncor, Route 179
12 is 1.9 miles longer than the shortest proposed route but only 1.1 miles shorter than the
13 longest alternative route, making it one of the lengthier choices.¹ Route 179 does not utilize
14 Links J22 and L1. Based on my review of the map included by Oncor as page 6 of Exhibit
15 BJP-5 and my knowledge of the area, Links J22 and L1 appear to mostly run through
16 existing right of way for a freight rail line and flood plain for Harriet Creek.

17 **Q. Have you compared the estimated cost of the Route 4626 to the cost of routes that**
18 **would cross the Core Property?**

19 A. Yes. Based on my review of Oncor's application, it appears that Route 179 is more
20 expensive than several alternative routes that would utilize Links J22 and L1. For instance,

¹ Direct Testimony of Brenda J. Perkins at 9-10 (Jun. 8, 2023).

1 Route 58 would cost an estimated \$166,209,000, which is nearly nine million dollars less
2 than recommended Route 179.²

3 **Q. If the Commission decides not to select Route 58 for some reason, are there other**
4 **viable route candidates that do not include Link C1?**

5 A. Yes. Numerous other routes utilize Links J22 and L1, and most of those routes are shorter
6 and less expensive than Route 179.

7 **Q. If the Commission decides to consider not just costs but also the effects of the**
8 **proposed transmission line on habitable structures near the line, does that tip the**
9 **scales in favor of a route containing Links J22 and L1?**

10 A. Yes. As I stated before, Links J22 and L1 are proposed to be routed on existing rail right
11 of way and the Harriett Creek floodplain. Based on my experience in land development,
12 placement of the route within existing right of way and a floodplain area will reduce the
13 overall impact of the transmission line to habitable structures and developable land. By
14 contrast, the J3 and K1 proposed links will bisect the Core Property through one of the
15 most densely developed portions of TCCI Range – Mead’s development. As Ms. Perkins
16 noted in her testimony, there is practically no undeveloped property in this part of the state
17 that is not slated for development in the near future.³ It is likely that any proposed route
18 transects some land that is not developed now but will be soon. From TCCI Range –
19 Mead’s perspective, it makes the most sense to choose a route that includes Links J22 and
20 L1 because most of the distance of those two links is already within right of way and
21 floodplain that cannot legally be developed in the future.

² *Id.* at 40, 45 (Exhibit BJP-5 at 10, 15).

³ *Id.* at 7:3-7, 10:19-29.

V. CONCLUSION

1 **Q. Please summarize your recommendation in this case.**

2 A. I recommend that the Commission approve Route 58 or a similar route that includes
3 Links J22 and L1. Those routes are more direct and less expensive than the
4 recommended Route 179, which will ultimately save money for Oncor and its ratepayers
5 and disrupt fewer planned residential communities.

6 **Q. Does this conclude your direct testimony?**

7 A. Yes.