

# **Filing Receipt**

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

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APPLICATION OF ONCOR ELECTRIC DELIVERY LLC TO AMEND ITS CERTIFICATE OF CONVENIENCE AND NECESSITY FOR THE RAMHORN HILL – DUNAHM 345-KV TRANSMISSION LINE IN DENTON AND WISE COUNTIES BEFORE THE STATE OFFICE

OF

ADMINISTRATIVE HEARINGS

#### DIRECT TESTIMONY OF INTERVENOR RAMA PRASAD CHALASANI

Intervenor Rama Prasad Chalasani files this Direct Testimony, which is attached. Rama

Prasad Chalasani stipulates that this Direct Testimony can be treated by all parties as if the answers

were filed under oath.

Respectfully submitted,

BRAUN & GRESHAM, PLLC P.O. Box 1148 (Mailing) Dripping Springs, Texas 78620 14101 Hwy. 290 W., Bldg. 1100 (Physical) Austin, Texas 78737 512-894-5426 (telephone) 512-894-3405 (fax)

/s/Patrick L. Reznik Patrick L. Reznik State Bar No. 16806780 preznik@braungresham.com Carly Barton State Bar No. 24086063 cbarton@braungresham.com

ATTORNEYS FOR RAMA PRASAD CHALASANI

### **CERTIFICATE OF SERVICE**

I certify that a true and correct copy of the foregoing document was served on all parties and counsel of record on July 31, 2023, in accordance with PUC Procedural Rule 22.74 and Orders issued in Docket No. 50067 to date.

/s/Patrick L. Reznik Patrick L. Reznik

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1 2		I. <u>INTRODUCTION</u>
2 3 4 5	QUESTION: RECORD.	PLEASE STATE YOUR NAME AND CURRENT ADDRESS FOR THE
6	ANSWER:	My name is Rama Prasad Chalasani, and my current address is 9837 Yellow
7	Cup drive, Fo	rt Worth, Texas, 76177.
8 9 10 11 12	· ·	ARE YOU AN INTERVENOR IN SOAH DOCKET NO. 473-23-21216 OCKET NO. 55067 AND ON WHOSE BEHALF ARE YOU TESTIFYING?
13	ANSWER:	Yes. I'm testifying behalf of myself.
14 15 16 17 18 19		HAVE YOU EVER TESTIFIED IN A PUBLIC UTILITY COMMISSION 'PUC" OR "COMMISSION") PROCEEDING? No.
20 21 22 23 24 25	WORK HIST	BRIEFLY DESCRIBE YOUR OCCUPATION, EDUCATIONAL AND ORYS. work as Software Engineer and have a bachelor's degree in electrical
26	engineering.	
27 28 29 30 31		WHERE IS YOUR PROPERTY LOCATED? Iy address is 14933 S COUNTY LINE RD JUSTIN, TX 76247. The legal
32	description is	A0032A G. B. BUCHANAN, TR 7 & 8, 52.55 ACRES, OLD DCAD TR
33	#3 & 3A.	
34 35 36 37 38	QUESTION: ANSWER:	HOW LONG HAVE YOU OWNED THE PROPERTY? Since 2018.
39 40	-	ARE YOU FAMILIAR WITH THIS AREA OF TEXAS?

Direct Testimony of Intervenor Rama Prasad Chalasani SOAH Docket No. 473-23-21216 PUC Docket No. 55067 Page 4 of 8 1 ANSWER: Yes. 2

3				
4	II. <u>PURPOSE AND SCOPE OF TESTIMONY</u>			
5				
6 7	QUESTION: WHAT IS THE PURPOSE AND SCOPE OF YOUR TESTIMONY?			
8	ANSWER: The purpose of my testimony is to (a) describe my property, (b) describe			
9	the expected impact of the proposed transmission line on my property and (c) voice my			
10	opposition against Segments M8, O8, Q1, Q2, Q3 and Q5 and Routes 67, 68, and 69.			
11 12				
12	III. DESCRIPTION OF PROPERTY AND THE LINE'S IMPACT			
14				
15				
16 17	QUESTION: ARE THERE ANY HABITABLE STRUCTURES ON THE PROPERTY?			
18	ANSWER: No.			
19				
20	QUESTION: PLEASE DESCRIBE YOUR PROPERTY'S CURRENT USES,			
21	INCLUDING BRIEFLY DESCRIBING ANY RANCH OR SPECIALIZED			
22 23	OPERATIONS.			
23 24	ANSWER: None.			
25				
26 27	QUESTION: HAVE YOU OR YOUR FAMILY UNDERTAKEN ANY EFFORTS TO RESTOR THE LAND OR THE ENIRONMENTAL QUALIT OF THE PROPERTY?			
28				
29	ANSWER: No.			
30				
31 32	QUSTION: ARE THERE ANY WATER WELL SITES ON THE PROPERTY? IF SO,			
33	DESCRIBE THE GENRAL LOCATION.			
34				
35	ANSWER: Yes. It is close to S County Road.			
36				
37	AUEGEVANT ARE EUERE ANY GAG WELLG AN EUE PROPERTYO IE CO			
38 39	QUESTION: ARE THERE ANY GAS WELLS ON THE PROPERTY? IF SO,			
39 40	DESCRIBE THE GENERAL LOCATION.			
41	ANSWER: Yes. It is in the middle of the Property, but somewhat close to S County Road			
42	and on the north side of the Property.			
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1 2 QUESTION: ARE THERE ANY PIPELINE EASEMENTS ON THE PROPERTY? IF SO, DESCRIBE THE GENERAL LOCATION. 3 4 5 ANSWER: Yes, there is 30 feet easement for a pipeline to the East (along S County 6 Road) and on the South side (along W County Road). There is a one-acre site for Gas 7 compressor exists under lease. 8 9 10 QUESTION: PLEASE DESCRIBE ANY PLANNED FUTURE USES OF YOUR 11 PROPERTY IF THOSE USES ARE DIFFERENT FROM THE CURRENT USES 12 PREVIOUSLY DESCRIBED. 13 14 ANSWER: We want to use this land for commercial development along the East and South 15 side and use the rest for Housing. 16 17 18 OUESTION: DO ANY EXISTING TRANSMISSION OR DISTRIBUTION LINES 19 CROSS YOUR PROPERTY? IF SO, PLEASE DESCRIBE HOW AND WHERE THEY 20 CROSS THE PROPERTY. 21 22 ANSWER: There is an existing distribution line of the East side of it along with S County 23 Road. 24 25 QUESTION: ARE THERE CURRENT PLANS FOR OTHER UTILITY FEATURES ON 26 27 YOUR PROPERTY? IF SO, PLEASE DESCRIBE HOW AND WHERE THEY CROSS 28 THE PROPERTY. 29 30 ANSWER: There is 30 feet Gas pipeline easement on East and South side of property along 31 with Existing Road and one acre site under lease for Gas Compressor Station. 32 33 34 QUESTION: HOW WOULD A 345-KV ELECTRIC TRANSMISSION LINE IMPACT 35 YOUR PROPERTY AND ITS OPERATIONS? 36 37 ANSWER: Yes, it will greatly impact the property. The proposed line does not follow 38 property boundary and bisects property of East and West/North to South and would prevent 39 us from being able to develop it as a Commercial Property/housing. Direct Testimony of Intervenor Rama Prasad Chalasani SOAH Docket No. 473-23-21216 PUC Docket No. 55067

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1 2 3 QUESTION: WOULD YOU HAVE TO REGULARLY DRIVE UNDER THE 4 TRANSMISSION LINE IF INSTALLED ON YOUR PROPERTY. 5 6 ANSWER: Yes. The transmission line proposed in the middle of the Property we need 7 to drive regularly under the transmission line. 8 9 QUESTION: IS THIS YOUR FIRST EFFORT TO COMMUNICATE YOUR 10 CONCERNS WITH ONCOR? 11 12 13 ANSWER: No. I communicated with Oncor by email in the month of December 2022. 14 15 16 QUESTION: IF THE TRANSMISSION LINE IS BUILT ON YOUR PROPERTY, DO YOU HAVE ANY CONCERNS ABOUT ONCOR HAVING ACCESS TO YOUR 17 **PROPERTY**? 18 19 20 ANSWER: Yes, I have the general concerns of landowners who are required to give 21 third parties access to their property. 22 23 QUESTION: IF THE TRANSMISSION LINE IS BUILT ON YOUR PROPERTY, DO 24 25 YOU HAVE ANY OTHER CONCERNS? 26 27 ANSWER: Yes, I am seriously concerned about devaluation to my property and my 28 community as a result of this proposed line. 29 30 31 **IV. CONCLUSION AND RECOMMENDATIONS** 32 QUESTION: HOW WOULD YOU SUMMARIZE YOUR POSITION IN THIS 33 34 PROCEEDING REGARDING ONCOR'S RECOMMENDED ROUTE 179 AND THE 35 PROPOSED ALTERNATIVE ROUTES? 36 37 ANSWER: I specifically oppose any route using Segments M8, O3, O8, Q1, Q2, and Q5 38 and Routes 67, 68, and 69. I fully support Oncor's Recommended Route 179. 39 40

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- 1 QUESTION: DOES THIS CONCLUDE YOUR TESTIMONY? 2
- 3 ANSWER: Yes.

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