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

APPLICATION OF ONCOR ELECTRIC	§	BEFORE THE
DELIVERY LLC TO AMEND ITS	§	
CERTIFICATE OF CONVENIENCE	§	PUBLIC UTILITY COMMISSION
AND NECESSITY FOR THE	§	
RAMHORN HILL – DUNHAM 345-KV	§	OF TEXAS
TRANSMISSION LINE IN DENTON	§	
AND WISE COUNTIES	§	
	§	

DIRECT TESTIMONY

OF

GEOFFREY A. MEYER

ON BEHALF OF

EXEL INC. D/B/A DHL SUPPLY CHAIN (USA)

July 31, 2023

1 **Q. PLEASE STATE YOUR NAME.**

2 A. Geoff Meyer.

3 **Q. HAVE YOU PREVIOUSLY TESTIFIED IN A COMMISSION PROCEEDING?**

4 A. No, I have not.

5 **Q. ARE YOU TESTIFYING ON BEHALF OF AN INTERVENOR IN THIS CASE?**

6 A. Yes, I am testifying on behalf of Exel Inc., d/b/a DIIL Supply Chain (USA).

7 **Q. WHAT IS YOUR ROLE OR RELATIONSHIP WITH DHL SUPPLY CHAIN?**

8 A. I am the Senior Director of Real Estate Solutions for DHL Supply Chain. Real Estate
9 Solutions (RES) is a full service Real Estate Development & Acquisition platform within DIIL
10 Supply Chain. I am responsible for the origination and execution of industrial facility
11 developments in the South and Western United States, including the Northlake facility in
12 Denton County that will be *significantly* impacted by any route that utilizes Link 15, as it is
13 proposed in the Application that is the subject of this proceeding.

14 **Q. PLEASE PROVIDE A BRIEF OVERVIEW OF YOUR WORK HISTORY.**

15 A. Prior to joining DHL Supply Chain in 2020, I served as Executive Vice President
16 for Van'Trust's Dallas office and led the company's efforts to secure acquisition and
17 development opportunities in Dallas and throughout Texas. Prior to that, I served as Director
18 of Development for Hines, a Houston developer, and as the Director of Real Estate
19 Development for Opus West Corporation. During my 25 year career, I have been responsible
20 for leasing and/or site acquisition and the development of more than 15 million square feet
21 of Office and Industrial space, including multiple master planned industrial parks.

22 **Q. PLEASE EXPLAIN WHAT DHL SUPPLY CHAIN DOES.**

1 A. DHL Supply Chain (formally known as Exel Inc. and sometimes also referred to
2 herein as simply DIIL) is the business-to-business logistics arm of Deutsche Post DIIL, the
3 world's leading global logistics company employing over 600,000 shipping professionals.
4 DHL Supply Chain helps customers develop business strategies to address their challenges in
5 moving their product around the world and increase speed-to-market, resilience, visibility and
6 control of that product while doing so. DIIL Supply Chain acquires, designs, builds and then
7 operates efficient, flexible, sustainable and innovative warehouses on behalf of its customers.
8 We use clean, green and safe solutions to help customers achieve their environmental
9 sustainability targets while being good neighbors and stewards of the community around our
10 facilities. We also continuously strive to provide a safe, inclusive, and purpose-driven
11 workplace for those that join the DIIL team and spend with us a portion of their valuable
12 time away from their families and friends.

13 **Q. WHAT IS THE PURPOSE OF THE NORTHLAKE FACILITY.**

14 A. The purpose of the Northlake facility (also referred to herein as the "Property") is to
15 accommodate and grow our North American "campus strategy" for DIIL Supply Chain
16 operations on behalf of our third-party customers. There are currently three major campus
17 markets across North America supporting DHL supply chain operations. Our existing Dallas
18 campus is the largest with approximately 16,000,000 square feet of operations in the region.
19 Because of this success, demand and the geographically favorable location of Texas within the
20 United States, DHL and its customers are increasingly interested in locating in Texas.
21 However, securing vacant, developable land in Texas has become increasingly difficult, and
22 the Northlake facility provides a rare opportunity to expand the campus strategy by
23 approximately 3,000,000 square feet.

1 The campus strategy is an important component of DHL Supply Chain's value
2 proposition. The ability to locate customer warehouse space within a DHL Supply Chain
3 campus allows for labor and equipment sharing, freight consolidation, increased security, and
4 availability of overflow space. These benefits provide DHL Supply Chain with a competitive
5 advantage through cost savings that can be shared with its customers, as well as the ability to
6 provide customers with improved and more consistent service.

7 **Q. PLEASE PROVIDE A GENERAL DESCRIPTION OF THE NORTHLAKE**
8 **FACILITY.**

9 A. As evidenced by the site plan attached as Exhibit GAM-1 and the routing map with
10 the site plan superimposed attached as Exhibit GAM-2, the Northlake facility will be tightly
11 filled with five industrial facilities ranging in height from 50 to 65 feet and exceeding a
12 cumulative total of 3,000,000 square feet of warehouse space. Using a comparison to existing
13 DHL operations of similar sized facilities, we can estimate, based on similar uses, in excess of
14 90,000,000 units of product will be shipped/received annually. To support this volume, we
15 there could be over 3,000 people working onsite and approximately 2,000 semitruck and other
16 vehicle trips coming in and out of the facilities on a daily basis, in 3 operating shifts, 24-hours
17 a day.

18 **Q. WHAT IS THE TIMING OF THE NORTHLAKE FACILITY'S DEVELOPMENT?**

19 A. The Northlake facility will be developed in a phased manner commencing with
20 earthwork in the Fall of 2023 and vertical construction beginning on Buildings 1, 2 and 3 in
21 2024. Substantial completion of those buildings are expected in early 2025, with Building 4
22 commencing the same year and reaching substantial completion in 2026, and Building 5
23 commencing thereafter.

1 **Q. WHAT HAS BEEN DONE TO DATE RELATIVE TO THE NORTHLAKE**
2 **FACILITY DEVELOPMENT PROJECT?**

3 A. Upon purchasing the property in the fall of 2021, DIIL has been focused on (3) three,
4 primary activities, all which have required a significant investment of time and money with the
5 ultimate goal of vertical construction.

6 DIIL has an executed development agreement with the Town of Northlake, which
7 has approved the project's site plan and preliminary plat. In addition, agreements with the
8 Town of Northlake are in place regarding roads, rights-of-way, and the dedication of drainage
9 and floodplain easements. Full design drawings for infrastructure have been submitted for
10 final review, including the detention pond that would be spanned by Link 15 and is
11 immediately adjacent to one of Link 15's angle structures. In addition, we are expecting the
12 Town of Northlake's imminent approval of both the mass-grading and plans for the to be
13 dedicated McPherson Road through the property. As of the submission of this written
14 testimony, the Town of Northlake has granted an early grading permit, and we are actively
15 pursuing bids on the mass grading package. We estimate we could commence earthwork as
16 early as October. We are finalizing agreements with the Town of Northlake on a drainage
17 easement and a floodplain easement to allow for drainage across the DIIL Property and the
18 proper environmental quality controls thereof, and both of easements will be publicly
19 dedicated in the near term.

20 It is worth noting that a majority of the infrastructure that I just discussed exists within
21 and along the right-of-way of Link 15, as it is proposed to run through our Northlake facility.

22 Shortly after closing, we obtained approval from Atmos Energy to build the roadway
23 named "McPherson Drive" through the Property at a less than a 90 degree angle overtop of
24 Atmos Energy's existing high-pressure natural gas line. Utility companies are typically not

1 amenable to allowing a crossing of their utility infrastructure by another interference at an
2 angle of less than 90 degrees, because it expands or lengthens the crossing or interference area
3 and thus creates more overlapping operation and maintenance areas where the two (the utility
4 and the proposed crossing facility) have to coexist. This is not ideal, because the existing utility
5 wants to minimize potential impacts and future work operations in its easement area to avoid
6 interference and/or damage to its infrastructure and/or utility service. Because the crossing
7 proposed by DIIL was to become a publicly-dedicated roadway, this was more palatable since
8 it was a shallow use of the land surface with minimal maintenance needs and would be
9 controlled by a governmental entity instead of a private party. The negotiations of the actual
10 agreement memorializing this arrangement has taken 18 months, and the Encroachment
11 Agreement with Atmos Energy related to McPherson Road has been executed and recorded.

12 Similarly, with Enlink Midstream, we had to obtain its approval to relocate its natural
13 gas supply line, but the documentation to support that process took considerable time and
14 was only recently executed. With the final agreement now fully executed and the initial
15 requisite payment processed to Enlink Midstream for the relocation of its natural gas supply
16 line, Enlink Midstream will begin design of the relocation and should commence sitework in
17 early September.

18 Lastly, we needed to obtain an easement from our neighbor to the east (Martin
19 Marietta) to build the roadway extension along the eastern boundary of our site. It ultimately
20 was obtained, as well.

21 Concurrent to the aforementioned negotiations, we went out to bid with contractors
22 in the 2nd Quarter of 2022. The bids were not acceptable due to constraints/escalations in the
23 then-current construction and materials market. As a result, the process slowed for a period
24 of time. Then, there were substantial challenges with the earthwork/civil design, including the

1 amount of cut/fill needed over certain existing utilities crossing the site, as well as substantial
2 grade changes at the perimeter boundary of the site, both of which required some additional
3 due diligence and redesign.

4 Finally, with revised civil engineering information and a favorable turn in the
5 construction materials and leasing market, we set out full speed ahead during the 1st Quarter
6 of 2023 with a fully constituted internal and external construction team to obtain final design
7 and permits with the anticipation of delivering the first phase of the campus (consisting of
8 Buildings 1, 2 and 3) in early 2025.

9 **Q. HAVE YOU HAD ANY INTERACTION WITH ONCOR ELECTRIC DELIVERY**
10 **LLC RELATIVE TO ITS RAMHORN HILL–DUNHAM 345-KV TRANSMISSION**
11 **LINE PROJECT?**

12 A. DIIL did not receive notice of Oncor’s public meeting about the project held in
13 December of 2022. Instead, DIIL learned of the transmission line project in February of 2023
14 through a casual conversation with officials from the Town of Northlake concerning its review
15 of DIIL’s site plans. DIIL promptly initiated contact with Oncor, informing them of DIIL’s
16 lack of notice and requesting an opportunity to meet. An in-person meeting was held March
17 22, 2023, with several DIIL representatives flying in to meet Oncor at its offices. At and prior
18 to that March meeting, Oncor provided its then-current routing map, and DIIL shared all
19 then-current information about its progress on the design and permitting of the site, as well
20 as several site maps illustrating alternative routes around the site’s perimeter. DIIL also
21 expounded upon the significant issues that the multiple links shown on Oncor’s maps to cross
22 DIIL’s property would have on the Northlake facility. Following those exchanges, all links
23 crossing the Northlake facility were removed from Oncor’s proposed alternative routes,
24 except Link I-5, which remains.

1 **Q. DO YOU HAVE ANY CONCERNS ABOUT LINK I5 BEING CONSTRUCTED**
2 **THROUGH THE NORTHLAKE FACILITY?**

3 A. I definitely do. In fact, most of the issues related to Link I5 are the same as the issues
4 previously presented to Oncor that resulted in the omission of other proposed links that
5 crossed the Northlake facility. Why Link I5 was not omitted remains a mystery to DHL.
6 Nevertheless, Link I5 has a number of its own unique issues that arise from its tightly confined
7 snaking, along with its angle structures, through the primary point of ingress and egress from
8 the roadway to the already tightly compacted site, through the confluence of multiple vehicular
9 flow patterns in and out of that point of ingress and egress, and through the loading area for
10 Building 2's loading bays. Link I5's right-of-way also completely consumes the 50-space,
11 permanent parking area for semitruck trailers needing extended stays.

12 In addition to the above, the following also are issues of concern:

- 13 • There are three 6-foot by 5-foot box culverts approved per the grading
14 plans that run inside and along a significant portion of Link I5's right-of-way and
15 apparently under one of its angle structures;
- 16 • There will be significant grade changes requiring cuts and as much as
17 10 feet of fill and the construction of a retaining wall within Link I5's right-of-way
18 and within the vicinity where its structures may be located; and
- 19 • Link I5's right-of-way and structures will also contend with
20 McPherson Road's right-of-way; encroachment issues with existing high-pressure
21 natural gas pipelines owned by Atmos Energy and Enlink Midstream and their
22 easements; two existing natural gas pad sites owned and operated by BKV Energy;
23 a publicly dedicated pond and drainage easement; and waterlines and fire
24 protection loops for the Northlake facilities.

1 Each of these issues is reflected on the schematic of the Northlake facility in the area
2 crossed by Link I5 that is attached as **Exhibit GAM-3**.

3 **Q. ARE THERE ANY OTHER ISSUES OR CONCERNS WITH LINK I5 CROSSING**
4 **THROUGH THE NORTHLAKE FACILITY?**

5 A. Yes. We at DHL also are very concerned about the safety of those who will be
6 constructing and working on and in the buildings that comprise our Northlake facility. As
7 previously indicated, the 5 industrial warehouses being constructed on the site will range in
8 height from 50 to 65 feet, which places them *at or above* the height of the transmission line's
9 bottom 345 kV circuit *and* the future 138 kV underbuild. If the tallest monopole design height
10 is used, the buildings will be just below the 138 kV underbuild's conductors. Cranes will be
11 used in the construction of each of the 5 warehouses, and cranes must be used to repair and
12 maintain their roofs and to install, repair and maintain equipment located thereon, including
13 solar panels. By company policy, all DHL warehouses will be designed to accommodate solar
14 panels. This creates an extremely dangerous situation, especially given the tight confines of
15 the area that Link I5 will have to snake through and need to be maintained, along with its
16 grade changes, retaining wall and other obstacles.

17 **Q. IS THERE ANYTHING ELSE THAT YOU WOULD LIKE TO ADDRESS**
18 **REGARDING LINK I5 AND DHL'S NORTHLAKE FACILITY?**

19 A. As I indicated previously, we anticipate having Buildings 1, 2, and 3 substantially
20 complete in early 2025 and commencing construction of Building 4 that same year and
21 Building 5 thereafter. Therefore, estimating that Oncor actually starts construction in 2025
22 after their right-of-way acquisition process is complete, our site will be 60% operational and
23 40% still under active construction. It will be a logistical nightmare to allow Oncor to plow

1 through the site during the completion of our construction and ongoing operations of the first
2 three buildings.

3 **Q. PLEASE EXPLAIN HOW THE NOTHLAKE FACILITY WILL BE**
4 **SIGNIFICANTLY IMPACTED BY ANY ROUTE THAT UTILIZES LINK I5, AS**
5 **YOU STATED PREVIOUSLY.**

6 A. As can be clearly seen on Exhibit GAM-3, Link I-5 is extremely problematic for the
7 development of DIIL's Northlake facility project, possibly to the extent of rendering it
8 infeasible from a logistical standpoint, which is the core of our business.

9 It should be noted that DHL Supply Chain's investment in the Property is not just
10 measured by the acquisition, due diligence, design and anticipated spend on vertical
11 construction. DIIL's investment in the DIIL Property far exceeds the development costs.
12 As the world's leading third-party logistics operator ("3PL"), we build these sites with our
13 customer-facing operations in mind. Meaning, DHL is not just investing in this site as an
14 owner/developer of real property, but as the 3PL servicer that will operate these buildings on
15 behalf of its customers for considerable time into the future. There could be tremendous
16 opportunity costs lost from the diminution or loss of customer prospects, long-term leases,
17 and operating services agreements for our 3PL customers that, but for the decrease in size,
18 reconfiguration or elimination of buildings in order to safely accommodate the routing of Link
19 I5 through the Northlake facilities project and the thousands of individuals who on a daily or
20 otherwise regular bases work in and on the Northlake facilities and must navigate their
21 semitrailers, automobiles, cranes and other equipment in and around Link I5.

22 The elimination or reduction of size of any singular building as shown on the
23 Northlake facilities project plan will severely affect the economics of DHL's investment in the
24 DHL Property.

1 **Q. DOES THIS CONCLUDE YOUR DIRECT TESTIMONY?**

2 A. Yes.

CERTIFICATE OF SERVICE

I hereby certify that on this 31st day of July 2023, a true and correct copy of the foregoing document was electronically filed with the Commission via the PUC Interchange in accordance with SOAH Order No.2 in this proceeding and the Commission's Second Order Suspending Rules in Docket No 50664.

By:  _____
Lynn Sherman

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

DIRECT TESTIMONY OF
GEOFFREY A. MEYER

STATE OF TEXAS §
COUNTY OF COLLIN §

AFFIDAVIT OF GEOFFREY A. MEYER

BEFORE ME, the undersigned authority, on this day personally appeared Geoffrey A. Meyer,
who, having been placed under oath by me, did depose and state as follows:

"My name is Geoffrey A. Meyer. I am the Senior Director Real Estate Solutions
for DHL Supply Chain.


I am of sound mind, capable of making this affidavit and have personal knowledge of
the facts stated in the Direct Testimony of Geoffrey A. Meyer filed on July 31, 2023,
with the Public Utility Commission of Texas as a part of PUC Docket No.
55067/SOAH Docket No. 473-23-21216.

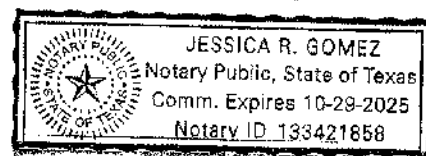
The Direct Testimony of Geoffrey A. Meyer was prepared by me, under my
supervision and with my approval, and the information that it contains is true and
correct to the best of my knowledge."

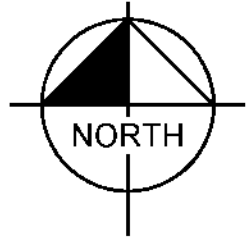
Further affiant sayeth not.


Geoffrey A. Meyer

SUBSCRIBED AND SWORN TO BEFORE ME by said Geoffrey A. Meyer on this the
18 day of July 2023.


Notary Public, State of Texas





GRAPHIC SCALE IN FEET
0 75 150 300

LEGEND

--- PROPERTY LINE
--- LOT LINE

HARMONSON ROAD

(AN APPARENT VARIABLE WIDTH PUBLIC RIGHT-OF-WAY, BY USE & OCCUPATION, DEDICATION NOT FOUND IN THE PUBLIC RECORD)

EXHIBIT "B-1"
WELL PAD EASEMENT
(INST. NO. 2021-148227)

FUTURE
BUILDING 4
1,798' X 620'
1,114,760 SF

BUILDING 3
1,188' X 310'
368,280 SF

BUILDING 2
756' X 420'
317,520 SF

EXHIBIT "B-2"
WELL PAD EASEMENT
(INST. NO. 2021-148227)

BUILDING 1
870' X 260'
226,200 SF

FUTURE
BUILDING 5
1,972' X 620'
1,222,640 SF

PROPOSED OVERHEAD
ELECTRIC LINE 1" IN THE ROW

PROPOSED DETENTION POND

PROPOSED 120' ROW

HARMONSON ROAD

(AN APPARENT VARIABLE WIDTH PUBLIC RIGHT-OF-WAY, BY USE &

DHL INDUSTRIAL - ONCOR TRANSMISSION EXHIBIT

NORTHLAKE, TX
MARCH 22, 2023

Kimley»Horn

PUC Dkt 55067
SOAH Dkt 473-23-21216
EXHIBIT

GAM-1

801 Cherry Street, Unit 11
Suite 1300
Fort Worth, TX 76102
817-335-6511
State of Texas Registration No. F-928

NOTE: THIS PLAN IS CONCEPTUAL IN NATURE AND HAS BEEN PRODUCED WITHOUT THE BENEFIT OF A SURVEY.
TOPOGRAPHY, UTILITIES, CONTACT WITH THE CITY, ETC.

FIGURE 2

DETAILED ROUTE
DESCRIPTION MAP

RAMHORN HILL SWITCH --
DUNHAM SWITCH

345 kV TRANSMISSION LINE PROJECT

LEGEND

- DUNHAM SWITCH
- RAMHORN HILL SWITCH
- STUDY AREA BOUNDARY
- NODES BETWEEN ADJACENT ROUTE LINKS
- ALTERNATIVE ROUTE LINK
- EXISTING TRANSMISSION LINE
- PIPELINE
- ROADWAY
- RAILROAD
- STREAM

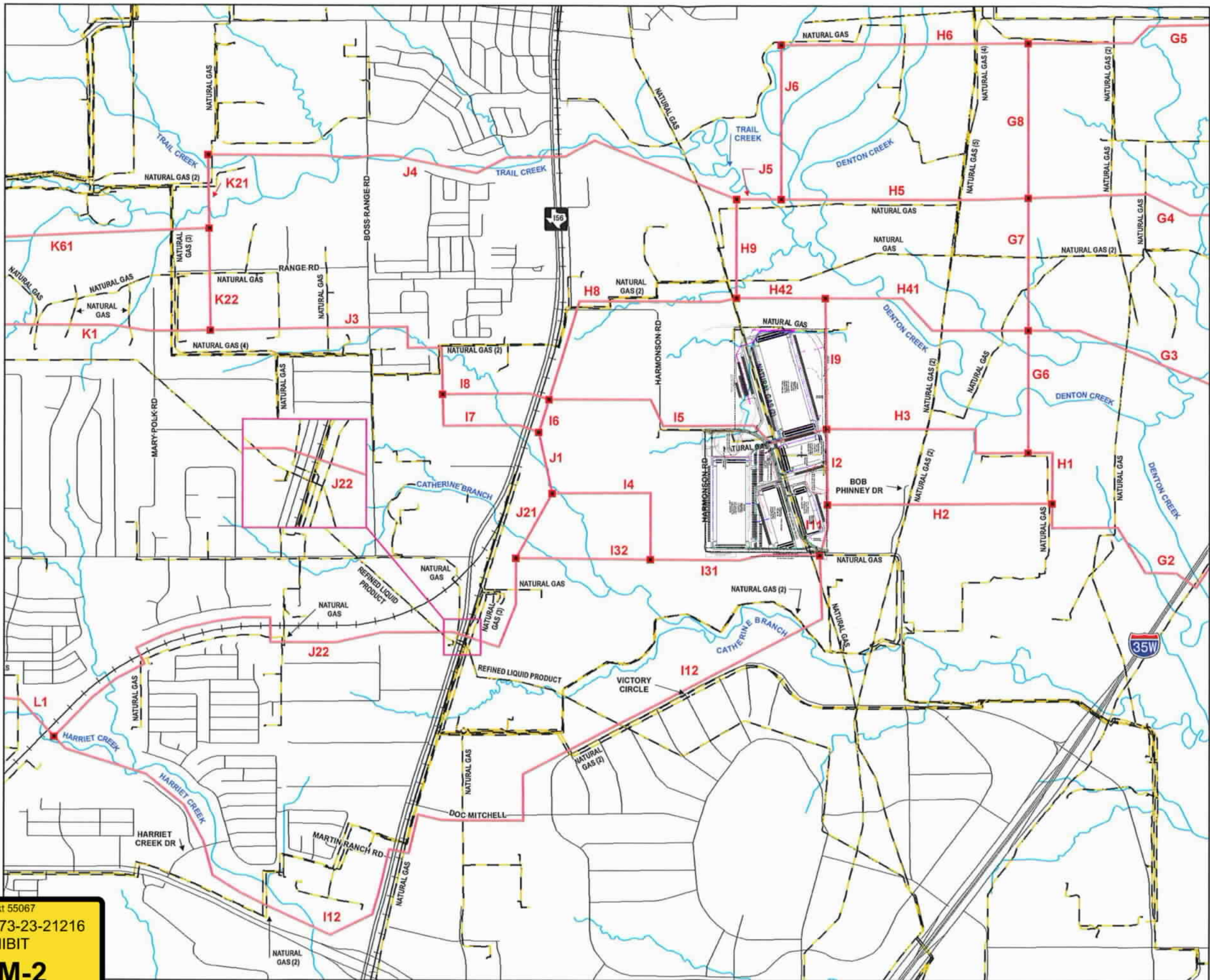
MAP EXTENT

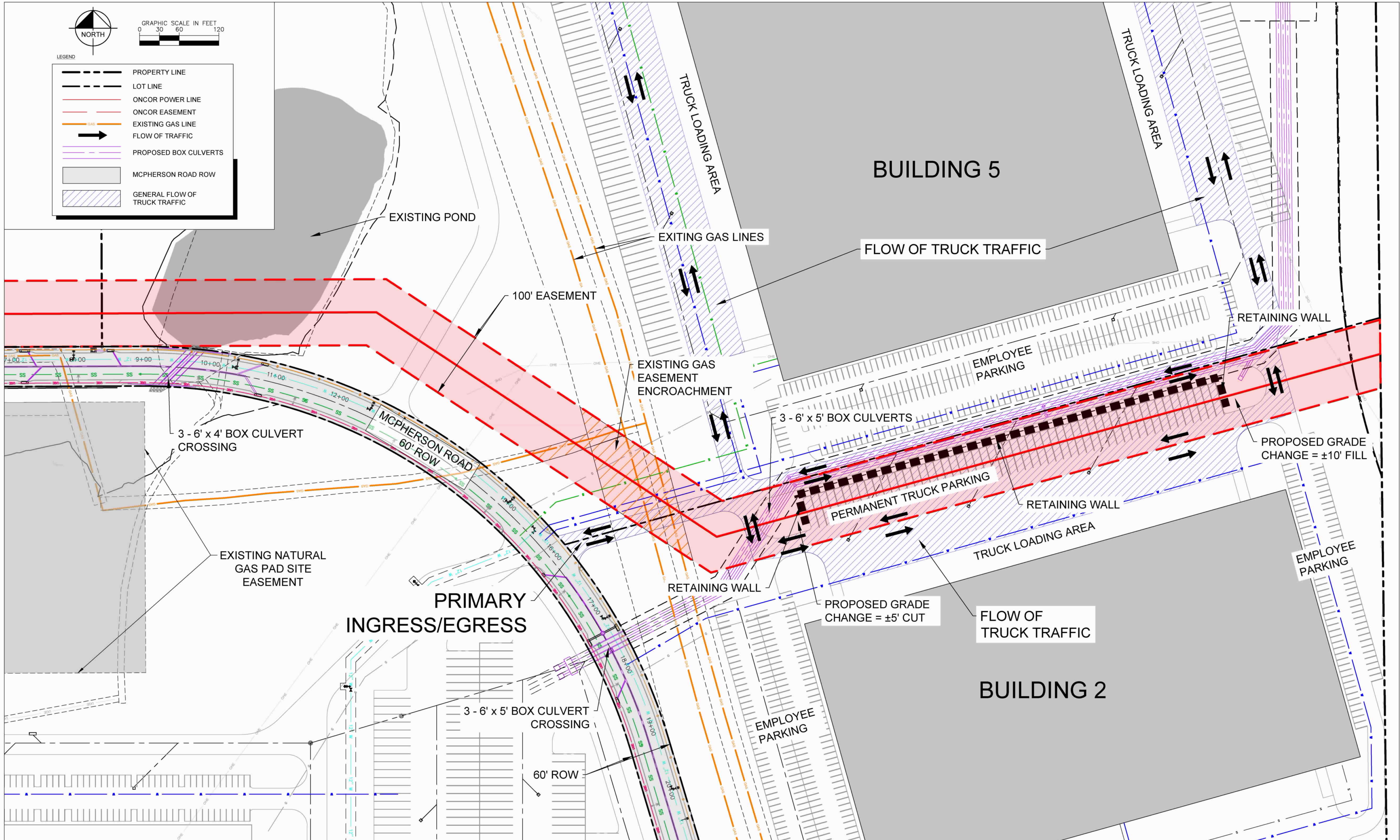


0 1,000 2,000 4,000
SCALE IN FEET

SOURCE: TEXAS NATURAL
RESOURCES INFORMATION
SYSTEM (TNRIS), 2023

ONCOR





ONCOR TRANSMISSION EXHIBIT

NORTHLAKE, TX
JULY 31, 2023

FOR DEMONSTRATIVE PURPOSES ONLY

PUC Dkt 55067
SOAH Dkt 473-23-21216
EXHIBIT

GAM-3

Kimley»Horn

801 Cherry Street, Unit 11
Suite 1300
Fort Worth, TX 76102
817-335-6511
State of Texas Registration No. F-928

NOTE: THIS PLAN IS CONCEPTUAL IN NATURE AND HAS BEEN PRODUCED WITHOUT THE BENEFIT OF A SURVEY TOPOGRAPHY, UTILITIES, CONTACT WITH THE CITY, ETC.