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

**CROSS-REBUTTAL TESTIMONY**

**OF**

**STEVE ELIS**

**ON BEHALF OF NEW DIMENSION INVESTMENTS II, LLC**

**AUGUST 14, 2023**

**CROSS-REBUTTAL TESTIMONY OF  
STEVE ELIS**

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**I. POSITION, QUALIFICATIONS, AND PURPOSE**

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

A. My name is Steve Elis, and my business address is 910 Freeport Parkway, Suite 140, Coppel, Texas 75019.

**Q. By whom are you employed and in what capacity?**

A. I am the President of New Dimension Investments II, LLC (New Dimension Investments). I am also the Chief Executive Officer of Southwest Sales, Inc. (Southwest Sales).

**Q. On whose behalf are you testifying in this proceeding?**

A. I am testifying on behalf of New Dimension Investments.

**Q. Did you file direct testimony in this proceeding?**

A. Yes, I did.

**Q. What is the purpose of your cross-rebuttal testimony in this proceeding?**

A. The purpose of my cross-rebuttal testimony is to address the direct testimony filed by Bobby Samuel on behalf of GRBK Edgewood LLC and GBTM Sendera LLC (Interchange Item No. 1444).

**II. CROSS-REBUTTAL TO BOBBY SAMUEL**

**Q. On whose behalf did Bobby Samuel file direct testimony?**

A. Mr. Samuel filed direct testimony on behalf of GRBK Edgewood LLC and GBTM Sendera LLC.

**Q. What portion of Mr. Samuel's testimony are you addressing?**

A. I address Mr. Samuel's recommendation to select several alternative routes based strictly on the fact that they are either cheaper or parallel existing corridors longer than

1 Route 179.<sup>1</sup> Specifically, I address Mr. Samuel's recommendation to select Route 117  
2 because it possesses the highest percentage parallel to existing corridors. I also address  
3 Mr. Samuel's recommendation to select Routes 1, 41, 42, 67, 72, 86, 94, 96, 103, 142,  
4 143, and 192 because they are cheaper to construct than Route 179.

5 **Q. On what basis does Mr. Samuel recommend Route 117?**

6 A. Mr. Samuel concludes that Route 117 possesses the highest percentage parallel to  
7 existing corridors and it does not utilize Segment M3, which he opposes.

8 **Q. Do you agree that Route 117 should be selected?**

9 A. No, I do not agree that Route 117 should be selected because it is not the route that best  
10 meets the routing criteria. While it does possess the highest percentage parallel to  
11 existing corridors (40%), there are several factors that make Route 117 a poor selection.  
12 Notably, it is the most expensive alternative route out of the 74 alternative routes  
13 proposed by Oncor Electric Delivery Company LLC (Oncor). Oncor estimated that the  
14 transmission line estimated cost for Route 117 is \$237,423,000, which is 35.5% more  
15 than Route 179, which has an estimated cost of \$175,208,000. Route 117 is also longer  
16 in route length (22.7 miles vs. Route 179 at 21.8 miles) and has a higher number of  
17 habitable structures within 500 feet its centerline (263 habitable structures vs.  
18 Route 179 with 97 habitable structures). Therefore, Alternative Route 117 should not  
19 be selected.

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<sup>1</sup> Direct Testimony of Bobby Samuel on Behalf of GRBK Edgewood LLC and GBTM Sendera LLC at 9–10 (Jul. 31, 2023).

1   **Q.     Why does Mr. Samuel recommend the selection of Routes 1, 41, 42, 67, 72, 86, 94,**  
2       **96, 103, 142, 143, and 192?**

3   A.     Mr. Samuel concludes that, based on Oncor's estimates, there are 20 routes that are all  
4       cheaper to construct than Route 179, and that of those 20 less expensive routes, only  
5       one utilizes Segment M3, which Mr. Samuel opposes. Mr. Samuel therefore seems to  
6       be proposing that one of these 19 cheaper routes that does not utilize Segment M3 be  
7       selected instead of Route 179. The 19 routes proposed by Mr. Samuel for these reasons  
8       include Routes 1, 41, 42, 67, 72, 86, 94, 96, 103, 142, 143, and 192, among others.

9   **Q.     Do you agree that Routes 1, 41, 42, 67, 72, 86, 94, 96, 103, 142, 143, or 192 should**  
10       **be selected?**

11 A.     No. In my opinion, none of these routes should be selected because they do not best  
12       meet the routing criteria. Mr. Samuel proposes these routes simply because they are  
13       less expensive than Route 179, although only slightly so, and because they avoid  
14       Segment M3, which he opposes. However, there are several factors that make these  
15       routes poor choices. Most importantly, all these routes have considerably more  
16       habitable structures within 500 feet of their centerlines than Route 179. Notably,  
17       Route 192, proposed by Mr. Samuel, has 400 habitable structures within 500 feet of its  
18       centerline, which is the highest number of habitable structures of any of the 74 proposed  
19       alternative routes. Route 192 has 303 more habitable structures than Route 179, which  
20       has 97. For this reason alone, Route 192 cannot be selected. Routes 1, 41, 42, 67, 72,  
21       86, 94, 96, 103, 142, and 143 also have more habitable structures within 500 feet of  
22       their centerlines. Table SE-1 below shows the habitable structure counts of the routes

proposed by Mr. Samuel compared to Route 179, and where they rank among the 74 alternative routes proposed by Oncor.<sup>2</sup>

Table SE-1

| Rank (out of all 74 proposed alternative routes) | Alternative Route Number | Number of habitable structures within 500 feet of the route centerline |
|--|--------------------------|--|
| 2nd  | 179                      | 97   |
| 15th   | 42                       | 158  |
| 16th   | 86                       | 158  |
| 18th   | 41                       | 168  |
| 20th   | 1                        | 188  |
| 22nd   | 72                       | 188  |
| 46th   | 143                      | 220  |
| 49th   | 142                      | 223  |
| 55th   | 67                       | 252  |
| 62nd   | 103                      | 287  |
| 63rd   | 96                       | 290  |
| 65th   | 94                       | 294  |
| 74th   | 192                      | 400  |

**Q. How does Route 179 compare to Routes 1, 41, 42, 67, 72, 86, 94, 96, 103, 142, 143, and 192 on other routing criteria?**

A. In addition to habitable structures, which is an important criterion, Route 179 better meets other routing criteria than the alternative routes proposed by Mr. Samuel. For example, of the routes compared above, only one route, Route 142, has a higher length of its route parallel to existing compatible rights-of-way than Route 179.<sup>3</sup> When

<sup>2</sup> See Application at Attachment 7—Routing Memorandum of Brenda J. Perkins at Table 2 (Jun. 8, 2023).

<sup>3</sup> *Id.*

1 comparing the length of the route across parks and recreational areas, Route 179 ranks  
2 the same or better than all routes.<sup>4</sup> Only one route, Route 94, has less length of its route  
3 crossing cropland and hay meadow than Route 179.<sup>5</sup> When analyzing the length of the  
4 routes across upland woodlands, riparian areas, and potential wetlands, Route 179  
5 ranks the best.<sup>6</sup> While it is true that the routes proposed by Mr. Samuel are slightly less  
6 costly than Route 179, they have significantly more habitable structures within 500 feet  
7 of their centerlines (as mentioned above), and most have more than double the amount  
8 of habitable structures. In addition, most of the alternative routes proposed by  
9 Mr. Samuel include more corners in the route and cross potential wetlands on an  
10 average length of 224 to 621 feet.

11 **Q. Do you have any other observations about Mr. Samuel's testimony?**

12 A. Yes. Mr. Samuel does not appear to take a holistic approach in recommending certain  
13 alternative routes. For example, he proposes that Route 117 be selected, which is the  
14 most expensive route and costs 35.5% more than Route 179, and then recommends that  
15 in the alternative, 19 other alternative routes should be selected because they are  
16 cheaper than Route 179. These recommendations are not consistent. In addition to  
17 being inconsistent, Mr. Samuel fails to consider the scale of costs associated with his  
18 recommended routes. Mr. Samuel proposes that Route 117 be selected, which costs  
19 \$62,215,000 *more* than Route 179. He then proposes 19 alternative routes strictly  
20 because they are cheaper than Route 179, but all 19 alternative routes proposed by

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<sup>4</sup> *Id.*

<sup>5</sup> *Id.*

<sup>6</sup> *Id.*



1 Mr. Samuel are within an \$8,382,000 range from Route 179, and they all rank worse  
2 than Route 179 when considering various other routing criteria. Mr. Samuel fails to  
3 consider more than one routing criterion at a time and does not make a recommendation  
4 based on which route best meets the routing criteria as a whole.

5 **III. REBUTTAL TO OTHER INTERVENORS**

6 **Q. Have you reviewed the statements of position and testimonies filed by other**  
7 **intervenors?**

8 A. Yes.

9 **Q. Do you support their recommendations?**

10 A. New Dimension Investments supports the selection of Route 179 and does not oppose  
11 any other proposed alternative route that does not utilize Segments R6 or U1.

12 **IV. SUMMARY AND CONCLUSION**

13 **Q. What are your recommendations in this proceeding?**

14 A. I recommend that the Commission select Route 179.

15 **Q. Does this conclude your testimony?**

16 A. Yes, it does.