



## **Filing Receipt**

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

<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 TO DUNHAM</b>	<b>§</b>	
<b>345 KV TRANSMISSION LINE IN</b>	<b>§</b>	
<b>DENTON AND WISE COUNTIES</b>	<b>§</b>	<b>ADMINISTRATIVE HEARINGS</b>

**CROSS-REBUTTAL TESTIMONY AND EXHIBIT OF**

**L. RUSSELL LAUGHLIN**

**ON BEHALF OF  
THE HILLWOOD PARTIES**

**AUGUST 14, 2023**

**CROSS-REBUTTAL TESTIMONY OF L. RUSSELL LAUGHLIN  
ON BEHALF OF THE HILLWOOD PARTIES**

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**EXHIBITS**

LRL-CR1            Speedway Town Center – Marketing Plan

## **CROSS-REBUTTAL TESTIMONY OF L. RUSSELL LAUGHLIN**

### **I. INTRODUCTION**

**Q: PLEASE STATE YOUR NAME, BUSINESS ADDRESS, AND CURRENT EMPLOYMENT POSITION?**

**A:** My name is L. Russell Laughlin. My business address is 9800 Hillwood Pkwy., Ste. 300, Fort Worth, Texas 76177. I am currently the Executive Vice President for Strategic Development and Innovation for Hillwood Development Company, LLC, which is an affiliate of the Hillwood Parties identified in my direct testimony.

**Q: ARE YOU THE SAME L. RUSSELL LAUGHLIN WHO PREVIOUSLY SUBMITTED DIRECT TESTIMONY IN THIS PROCEEDING ON BEHALF OF HILLWOOD PARTIES?**

**A:** Yes.

**Q: WHAT IS THE PURPOSE OF YOUR CROSS-REBUTTAL TESTIMONY?**

**A:** My Cross-Rebuttal Testimony primarily addresses issues raised by the testimony of (i) Finley Ewing on behalf of intervenor La Estancia Investments, L.P. and (ii) James Clark on behalf of intervenor The City of Justin.

**Q: DOES THE FACT THAT YOU ARE NOT ADDRESSING EVERY PROPOSAL RAISED BY THESE AND OTHER PARTIES CONSTITUTE AN ENDORSEMENT OF THEIR RECOMMENDATIONS?**

**A:** No.

1 **Q: ARE YOU SPONSORING ANY EXHIBITS WITH YOUR CROSS-REBUTTAL**  
2 **TESTIMONY?**

3 **A:** Yes, I am attaching Exhibit LRL-CR1 which shows the current site plan from the approved  
4 Planned Development zoning ordinance for our Northlake 1171 property, as discussed  
5 below.

6 **II. RESPONSE TO LA ESTANCIA**

7 **Q: MR. EWING ARGUED IN HIS TESTIMONY THAT ONCOR SHOULD USE**  
8 **SEGMENTS E7 AND F1 RATHER THAN E6. DO YOU AGREE WITH THAT**  
9 **RECOMMENDATION?**

10 **A:** No, I do not. I continue to believe that the segments north of the “best meets” Route 179  
11 are more disruptive and should be rejected.

12 **Q: WHY DO YOU CONTINUE TO BELIEVE THAT?**

13 **A:** There are several reasons. It is a common view in our industry that large transmission lines  
14 built across prime commercial property with principal arterial and interstate access are not  
15 desirable. We concur with Mayor Rettig’s testimony. He correctly notes the location of the  
16 Segment E6 transmission line relative to Farm-to-Market Road 1171 avoids placing large  
17 transmission lines at the front door of prime commercial property and provides a unique  
18 opportunity to develop commercial properties between FM 1171 and Segment E6 with the  
19 transmission line behind them. I believe Mayor Rettig is also correct about the logically  
20 beneficial impact use of Segment E6 would have as a buffer between the commercial  
21 frontage of the La Estancia development and the likely industrial development that would

1 take place south of Segment E6<sup>1</sup> considering the adjacency to the airport and the current  
2 developments approved in Northlake recently in this area. I believe that fact further  
3 supports Mayor Rettig's recommendation in support of this portion of Route 179.

4 The Hillwood Parties have a fully zoned and entitled site plan in place for the  
5 Northlake 1171 property. My Cross-Rebuttal Exhibit 1 reflects that plan and highlights the  
6 disruption that will result if Mr. Ewing's recommendation is accepted. There is nothing in  
7 Mr. Ewing's testimony that suggests La Estancia is currently zoned for the purposes of  
8 commercial development across the tract. Our entitled development will be a high-end  
9 commercial and multifamily mixed-use development. The adjacent areas to the north and  
10 east of this Northlake 1171 property are consistent with our commercial and multifamily  
11 mixed-use development.

### 12 **III. RESPONSE TO CITY OF JUSTIN**

13 **Q: MAYOR CLARK (AND OTHER INTEVENORS FROM THE CITY OF JUSTIN)**  
14 **ARGUED AGAINST THE USE OF SEGMENTS J3 AND J4. DO YOU AGREE**  
15 **WITH THOSE RECOMMENDATIONS?**

16 **A:** No, I do not. The Hillwood Parties continue to believe that the "best meets" Route 179 is  
17 a better solution than using Segments I6-J1-J21-J22-L1.

18 **Q: WHY NOT?**

19 **A:** Again, there are several reasons. To avoid Segment J3, most routes supported by  
20 intervenors utilized either J4 or I6-J1-J21-J22-L1. Some parties like Mayor Clark that  
21 oppose Segment J3 also oppose J4, so if the Commissioners decided J4 is not a reasonable

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<sup>1</sup> See Direct Testimony of David A. Rettig for Town of Northlake, p.12.

1 alternative to J3, that suggests that pushing the route further south down Segments I6-J1-  
2 J21-J22-L1 is the only realistic alternative. As I noted in my direct testimony, the Hillwood  
3 Parties cannot support Segments I6, J1 or J21 without alterations to those segments pushing  
4 them further west, closer to the railroad on the western edge of our Speedway North  
5 property. Use of those links without adjustment would, in all likelihood, completely disrupt  
6 a currently functioning flight test center. Adoption of Segments I6-J1-J21 as currently  
7 proposed will amount to a condemnation of the flight test center.

8 **IV. CONCLUSION AND SUMMARY**

9 **Q: PLEASE SUMMARIZE YOUR CROSS-REBUTTAL TESTIMONY.**

10 **A:** I believe the Commission should reject the request by La Estancia to deviate from the “best  
11 meets” Route 179 by substituting Segments E7 and F1 in place of Segment E6. I also  
12 believe the Commission should reject requests to deviate from the “best meets” Route 179  
13 by avoiding Segment J3.

14 **Q: DOES THIS CONCLUDE YOUR CROSS-REBUTTAL TESTIMONY?**

15 **A:** Yes, it does.

**AFFIDAVIT OF L. RUSSELL LAUGHLIN**

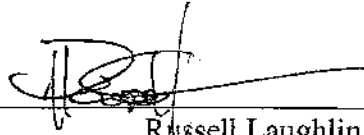
**State of Texas**       §

§

**County of Tarrant**   §

**BEFORE ME**, the undersigned authority, on this day personally appeared Russell Laughlin who, having been placed under oath by me, did depose as follows:

My name is Russell Laughlin. I am of legal age and a resident of the State of Texas. The foregoing cross-rebuttal testimony and exhibit offered by me are true and correct, and the opinions stated therein are, to the best of my knowledge and belief, accurate, true and correct.

  
\_\_\_\_\_  
Russell Laughlin

Subscribed and sworn to before me on this 14<sup>th</sup> day of August, 2023.

  
\_\_\_\_\_  
Notary Public, State of Texas

My Commission Expires:

9-2-2025



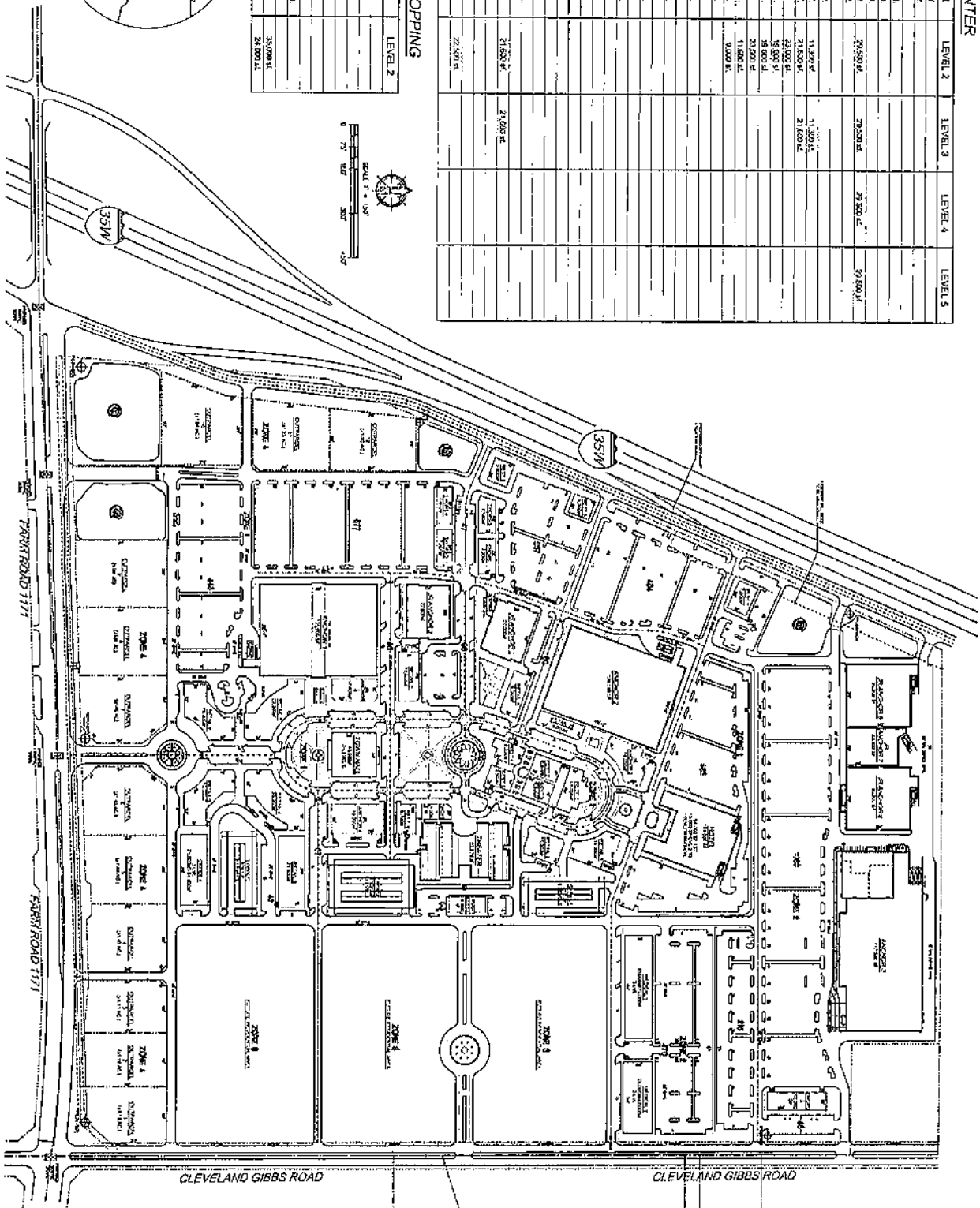
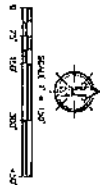
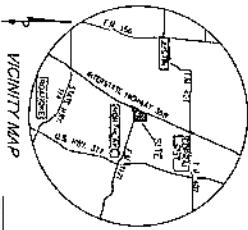


ZONE 1 - TOWN CENTER

BLOCK #	LEVEL 1	LEVEL 2	LEVEL 3	LEVEL 4	LEVEL 5
ASPHALT 1	170,194 sq. ft.	152,000 sq. ft.			
ASPHALT 2	27,000 sq. ft.	27,000 sq. ft.			
ASPHALT 3	11,000 sq. ft.	11,000 sq. ft.			
ASPHALT 4	14,000 sq. ft.	29,500 sq. ft.	79,500 sq. ft.	79,500 sq. ft.	
ASPHALT 5	14,000 sq. ft.	11,000 sq. ft.	11,000 sq. ft.	21,000 sq. ft.	
ASPHALT 6	21,000 sq. ft.	21,000 sq. ft.	21,000 sq. ft.		
ASPHALT 7	19,000 sq. ft.	19,000 sq. ft.	19,000 sq. ft.		
ASPHALT 8	23,000 sq. ft.	23,000 sq. ft.	23,000 sq. ft.		
ASPHALT 9	11,000 sq. ft.	11,000 sq. ft.	11,000 sq. ft.		
ASPHALT 10	9,000 sq. ft.	9,000 sq. ft.	9,000 sq. ft.		
LOCAL SHOPS	5,000 sq. ft.	5,000 sq. ft.	5,000 sq. ft.		
LOCAL SHOPS	7,000 sq. ft.	7,000 sq. ft.	7,000 sq. ft.		
LOCAL SHOPS	7,000 sq. ft.	7,000 sq. ft.	7,000 sq. ft.		
LOCAL SHOPS	7,000 sq. ft.	7,000 sq. ft.	7,000 sq. ft.		
RESTAURANT 1	11,000 sq. ft.	11,000 sq. ft.			
RESTAURANT 2	6,000 sq. ft.	6,000 sq. ft.			
RESTAURANT 3	6,000 sq. ft.	6,000 sq. ft.			
RESTAURANT 4	6,000 sq. ft.	6,000 sq. ft.			
RESTAURANT 5	6,000 sq. ft.	6,000 sq. ft.			
RESTAURANT 6	6,000 sq. ft.	6,000 sq. ft.			
RESTAURANT 7	6,000 sq. ft.	6,000 sq. ft.			
RESTAURANT 8	6,000 sq. ft.	6,000 sq. ft.			
RESTAURANT 9	6,000 sq. ft.	6,000 sq. ft.			
RESTAURANT 10	6,000 sq. ft.	6,000 sq. ft.			
OFFICE 1	27,000 sq. ft.	27,000 sq. ft.	27,000 sq. ft.		
OFFICE 2	55,176 sq. ft.	55,176 sq. ft.	55,176 sq. ft.		
OFFICE 3	150,000 sq. ft.	150,000 sq. ft.	150,000 sq. ft.		
OFFICE 4	22,000 sq. ft.	22,000 sq. ft.	22,000 sq. ft.		
OFFICE 5	6,000 sq. ft.	6,000 sq. ft.	6,000 sq. ft.		

ZONE 2 - IN-LINE SHOPPING

BLOCK #	LEVEL 1	LEVEL 2
ASPHALT 1	117,246 sq. ft.	
ASPHALT 2	52,000 sq. ft.	
ASPHALT 3	24,000 sq. ft.	
ASPHALT 4	50,000 sq. ft.	
ASPHALT 5	17,000 sq. ft.	
ASPHALT 6	33,000 sq. ft.	
ASPHALT 7	24,000 sq. ft.	
ASPHALT 8	24,000 sq. ft.	



SHEET  
1

DATE: 09/17/07  
DRAWN BY:  
DESIGNED BY:  
CHECKED BY:  
REVIEWED BY:

SPEEDWAY TOWN CENTER  
NORTHLAKE, TEXAS

MARKETING PLAN

**PROPERTY**  
**DESIGN & DEVELOPMENT**  
**STRATEGIC CONSULTING**  
**1001**  
**FT. WORTH, TX 76117**  
**Phone: 817.543.4000**  
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