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APPLICATION OF ONCOR ELECTRIC DELIVERY COMPANY, LLC TO AMEND ITS CERTIFICATE OF CONVENIENCE AND NECESSITY FOR THE RAMHORN HILL - DUNHAM 34-J TRANSMISSION LINE IN DENTON COUNTY

BEFORE THE STATE OFFICE

OF

ADMINISTRATIVE HEARINGS

OBJECTIONS TO INTERVENOR CROSS-REBUTTAL TESTIMONY SETH DELEON

August 17, 2023

I. INTRODUCTION OF WITNESS AND PURPOSE OF TESTIMONY

Q. Please state your name and address.

- A. My name is Seth DeLeon. My family resides at 3505 Meridian Drive, Northlake, Texas 76226.
- Q. On whose behalf are you providing cross-rebuttal testimony?
- A. I am testifying on behalf of myself, my family, and as a homeowner.
- Q. Are you the same Seth DeLeon that filed direct testimony in this docket?
- A. Yes. I filed direct testimony in this docket on July 30, 2023.

Q. Please briefly outline your educational backgrounds.

 A. I, Seth DeLeon, have a Bachelor's of Science in Data Analytics and Project Management, and also hold a Master's of Business Administration in Strategic Management. My wife holds a Bachelor's of Science in Chemical Engineering from Texas A&M University.

Q. What is the purpose of your cross-rebuttal testimony?

- A. The purpose of our cross-rebuttal testimony is to respond to the cross-rebuttal testimony of a particular testimony. I propose modifications that would make a particular route more acceptable to ourselves if they were accepted by the Public Utility Commission of Texas ("Commission").
- Q. Before addressing Intervenor witness' recommendations, please summarize your positions with regard to the potential transmission line routes.

A. As I explained in my testimony, I requested that the Commission approve an alternative to Oncor's routes utilization of routes 142, 143, 146, and any and all using link E5, E8, E3, E2, El, C9, C8, C4, and C7 as indicated in the Detailed Route Description Map. These routes will have a negative impact to the community, home values, and nature trails. I also request that the Commission approve an alternative to using links C-5, C-7, C-8, C-9, C21, C23, E-2, and E-3 as they will impact the community amenities, such as the community center, pool, playground, lawn area, and walking trails. Therefore, I object to using any of the aforementioned links. I would strongly support a modified version utilizing C3, C6, E1, and E6. Additionally, if needed and concessions were needed, I would support C-23, C-4, and C-6.

II. <u>RESPONSE TO ROUTE RECOMMENDATIONS</u>

Q. What is the purpose of this section of your cross-rebuttal testimony?

 A. In this section of our cross-rebuttal testimony, we respond to the Intervenor witness' recommendation regarding the route for the Oncor transmission line.

Q. Please turn now to the Intervenor witness' recommendations and explain how they would affect your property.

A. I address the cross-rebuttal testimony of John Poole on behalf of PUCT.¹ As a homeowner and resident of Canyon Falls, I disagree that utilizing routes C-7, C21,

¹ Docket No. 55067, Item No. 1646, Cross-Rebuttal Testimony of John Poole on Behalf PUCT

C23, and E-2, is the best route for selection. Every resident of Canyon Falls would be adversely impacted both economically and environmentally. Routes utilizing the C-7, C21, C23, and E-2 links, will be visible from other homes in the neighborhood, including the apartment complex. Overall, the mentioned lines would disturb the nature in the Canyon Falls green belt areas, community amenities, and walking trails. Due to these impacts, I support the proposal of Finley Ewing on behalf of La Estancia Investments to utilize link C-3, but only if it connects to C-6 following F.M. 1171 instead of being rerouted through the neighborhood.

- Q. Does this conclude your cross-rebuttal testimony?
- A. Yes.