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

APPLICATION OF ONCOR ELECTRIC DELIVERY LLC TO AMEND ITS CERTIFICATE OF CONVENIENCE AND NECESSITY FOR THE RAMHORN HILL – DUNHAM 345-KV TRANSMISSION LINE IN DENTON AND WISE COUNTIES	§ § § § § § §	BEFORE THE STATE OFFICE OF ADMINISTRATIVE HEARINGS
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**RAMA PRASAD CHALASANI'S NOTICE OF CROSS-EXAMINATION
AND EXHIBIT LIST**

TO THE HONORABLE ADMINISTRATIVE LAW JUDGES:

COMES NOW, Rama Prasad Chalasani and pursuant to SOAH Order No. 2 files this notice of cross-examination and list of exhibits that will be offered at the hearing commencing on August 28, 2023.

I. Notice of Cross-Examination

Rama Prasad Chalasani does not designate any intervenor witnesses for cross-examination, but reserves the right to cross-examine any witness called by any other party for cross-examination.

II. Exhibit List

At the hearing, Rama Prasad Chalasani will offer the following exhibits. Pursuant to SOAH Order No. 2, these exhibits will be provided to the parties via a file-sharing site provided by Oncor Electric Delivery, LLC. All exhibits listed have been pre-filed on the Public Utility Commission of Texas Interchange.

EXHIBIT NO.	DESCRIPTION	INTERCHANGE NO.
Chalasani Exhibit 1	Direct Testimony of Intervenor Rama Prasad Chalasani	1439

Respectfully submitted,

BRAUN & GRESHAM, PLLC

P.O. Box 1148 (Mailing)
Dripping Springs, Texas 78620
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/s/Patrick L. Reznik

Patrick L. Reznik

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**ATTORNEYS FOR RAMA PRASAD
CHALASANI**

CERTIFICATE OF SERVICE

I certify that a true and correct copy of foregoing document will be served on all parties of record on August 23, 2023, in accordance with PUC Procedural Rule 22.74 and Orders issued in Docket No. 55067.

/s/Patrick L. Reznik

Patrick L. Reznik

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INTERVENOR RAMA PRASAD CHALASANI'S EXHIBIT LIST

EXHIBIT	DESCRIPTION	OFFERED	ADMITTED
Chalasani Exhibit 1	Direct Testimony of Intervenor Rama Prasad Chalasani		

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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
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Carly Barton
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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 **I. INTRODUCTION**

2
3 QUESTION: PLEASE STATE YOUR NAME AND CURRENT ADDRESS FOR THE
4 RECORD.

5
6 ANSWER: My name is Rama Prasad Chalasani, and my current address is 9837 Yellow
7 Cup drive, Fort Worth, Texas, 76177.

8
9
10 QUESTION: ARE YOU AN INTERVENOR IN SOAH DOCKET NO. 473-23-21216
11 AND PUC DOCKET NO. 55067 AND ON WHOSE BEHALF ARE YOU TESTIFYING?

12
13 ANSWER: Yes. I'm testifying behalf of myself.

14
15
16 QUESTION: HAVE YOU EVER TESTIFIED IN A PUBLIC UTILITY COMMISSION
17 OF TEXAS ("PUC" OR "COMMISSION") PROCEEDING?

18
19 ANSWER: No.

20
21
22 QUESTION: BRIEFLY DESCRIBE YOUR OCCUPATION, EDUCATIONAL AND
23 WORK HISTORYS.

24
25 ANSWER: I work as Software Engineer and have a bachelor's degree in electrical
26 engineering.

27
28
29 QUESTION: WHERE IS YOUR PROPERTY LOCATED?

30
31 ANSWER: My 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 QUESTION: HOW LONG HAVE YOU OWNED THE PROPERTY?

36
37 ANSWER: Since 2018.

38
39 QUESTION: ARE YOU FAMILIAR WITH THIS AREA OF TEXAS?
40

1 ANSWER: Yes.
2
3

4 **II. PURPOSE AND SCOPE OF TESTIMONY**

5
6 QUESTION: WHAT IS THE PURPOSE AND SCOPE OF YOUR TESTIMONY?
7

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 13 **III. DESCRIPTION OF PROPERTY AND THE LINE'S IMPACT**

14
15
16 QUESTION: ARE THERE ANY HABITABLE STRUCTURES ON THE PROPERTY?
17

18 ANSWER: No.
19

20 QUESTION: PLEASE DESCRIBE YOUR PROPERTY'S CURRENT USES,
21 INCLUDING BRIEFLY DESCRIBING ANY RANCH OR SPECIALIZED
22 OPERATIONS.
23

24 ANSWER: None.
25

26 QUESTION: HAVE YOU OR YOUR FAMILY UNDERTAKEN ANY EFFORTS TO
27 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

38 QUESTION: ARE THERE ANY GAS WELLS ON THE PROPERTY? IF SO,
39 DESCRIBE THE GENERAL LOCATION.
40

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.

1
2 QUESTION: ARE THERE ANY PIPELINE EASEMENTS ON THE PROPERTY? IF
3 SO, DESCRIBE THE GENERAL LOCATION.

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 QUESTION: 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
26 QUESTION: ARE THERE CURRENT PLANS FOR OTHER UTILITY FEATURES ON
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.

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
10 QUESTION: IS THIS YOUR FIRST EFFORT TO COMMUNICATE YOUR
11 CONCERNS WITH ONCOR?

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
17 YOU HAVE ANY CONCERNS ABOUT ONCOR HAVING ACCESS TO YOUR
18 PROPERTY?

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
24 QUESTION: IF THE TRANSMISSION LINE IS BUILT ON YOUR PROPERTY, DO
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
33 QUESTION: HOW WOULD YOU SUMMARIZE YOUR POSITION IN THIS
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.

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