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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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MARTIN ROJAS’S NOTICE OF CROSS-EXAMINATION AND EXHIBIT LIST

TO THE HONORABLE ADMINISTRATIVE LAW JUDGES:

COMES NOW, Martin Rojas 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

Martin Rojas 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, Martin Rojas 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.
Martin Rojas Exhibit 1	Direct Testimony of Intervenor Martin Rojas	1437

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 MARTIN ROJAS

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 MARTIN ROJAS’S EXHIBIT LIST

EXHIBIT	DESCRIPTION	OFFERED	ADMITTED
Martin Rojas Exhibit 1	Direct Testimony of Intervenor Martin Rojas		

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DIRECT TESTIMONY OF MARTIN ROJAS

Intervenor, Martin Rojas files this Direct Testimony, which is attached, and 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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ATTORNEYS FOR MARTIN ROJAS

MARTIN ROJAS EXHIBIT 1

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 Martin Rojas and my current address is 1231 Bellaire Drive
7 Grapevine, Texas 765051

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
12 TESTIFYING?

13
14 ANSWER: Yes. I am testifying on behalf of myself.

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

19
20 ANSWER: No.

21
22
23 QUESTION: BRIEFLY DESCRIBE YOUR OCCUPATION, EDUCATIONAL AND
24 WORK HISTORIES.

25
26 ANSWER: I attended the University of Texas at Austin and graduated with a degree in
27 Business in '94. Since then, I have spent the next 30 years working in various technology
28 and utility/telecom companies like US West, TXU energy, Frontier, MCI, & Verizon, in
29 sales, operations, and business analysis. I currently work in the SEO/SEM field as a
30 business consultant.

31
32
33 QUESTION: WHERE IS YOUR PROPERTY LOCATED?

34
35 ANSWER: At the intersection of South County Line Rd and Jay lane.

36
37
38 QUESTION: HOW LONG HAVE YOU OWNED THE PROPERTY?

39
40 ANSWER: 22 years

1
2 QUESTION: ARE YOU FAMILIAR WITH THIS AREA OF DENTON AND WISE
3 COUNTIES, TEXAS?

4
5 ANSWER: Yes, I have lived in this area for almost 30 years.
6
7

8 **II. PURPOSE AND SCOPE OF TESTIMONY**
9

10 QUESTION: WHAT IS THE PURPOSE AND SCOPE OF YOUR TESTIMONY?

11
12 ANSWER: The purpose of my testimony is to (a) describe my property, (b) describe
13 the expected impact of the proposed transmission line on my property and (c) voice my
14 opposition against any route that uses Segments M8, O3, O8, Q1, Q2, and Q5 and Routes
15 67, 68, and 69.
16
17

18 **III. DESCRIPTION OF PROPERTY AND THE LINE'S IMPACT**
19
20

21 QUESTION: ARE THERE ANY HABITABLE STRUCTURES ON THE
22 PROPERTY?

23
24 ANSWER: No.
25
26

27 QUESTION: PLEASE DESCRIBE YOUR PROPERTY'S TERRAIN AND ITS
28 ECOLOGICAL OR BIOLOGICAL FEATURES.
29

30 ANSWER: Approximately 16 acres of flat land upon which we have been growing hay
31 for the past two decades.
32
33

34 QUESTION: PLEASE DESCRIBE YOUR PROPERTY'S CURRENT USES,
35 INCLUDING BRIEFLY DESCRIBING ANY RANCH OR SPECIALIZED
36 OPERATIONS.
37

38 ANSWER: We have been growing hay for direct consumption by our cattle for the
39 past two decades, and we have had an agricultural exemption for over two decades.
40

1
2 QUESTION: HAVE YOU OR YOUR FAMILY UNDERTAKEN ANY EFFORTS TO
3 RESTORE THE LAND OR THE ENVIRONMENTAL QUALITY OF THE
4 PROPERTY?
5

6 ANSWER: We have been growing hay for direct consumption by our cattle for the past
7 two decades, and we have had an agricultural exemption for over two decades. As hay
8 prices have fluctuated so greatly over the decades, especially during times of drought,
9 which is the current case in 2023, it has been of utmost importance to maintain the clean
10 environmental quality of this land in order to continue to harvest affordable hay from
11 year to year.
12
13

14 QUESTION: ARE THERE ANY WATER WELL SITES ON THE PROPERTY? IF
15 SO, DESCRIBE THE GENERAL LOCATION.
16

17 ANSWER: No.
18

19 QUESTION: ARE THERE ANY GAS WELLS ON THE PROPERTY? IF SO,
20 DESCRIBE THE GENERAL LOCATION.
21

22 ANSWER: No.
23
24

25 QUESTION: ARE THERE ANY PIPELINE EASEMENTS ON THE PROPERTY? IF
26 SO, DESCRIBE THE GENERAL LOCATION.
27

28 ANSWER: There is a one-acre easement for building some type of gas pump on the back
29 SW corner of the property.
30

31 QUESTION: PLEASE DESCRIBE THE CURRENT AND PLANNED FUTURE
32 USES OF YOUR PROPERTY AND HOW THOSE USES CONTRIBUTE TO THE
33 COMMUNITY VALUES OF DENTON AND WISE COUNTIES, TEXAS?
34

35 ANSWER: This land was purchased as a place for our families to retire, upon which we
36 would build our homes and live out our golden years in peace and tranquility in the
37 country. Our plan was for each of us to divide the land equally and build our retirement

1 homes and have animals on the land from which to live, like cattle, chicken, and goats,
2 and raise our own vegetables.

3
4
5 QUESTION: DO ANY EXISTING TRANSMISSION OR DISTRIBUTION LINES
6 CROSS YOUR PROPERTY? IF SO, PLEASE DESCRIBE HOW AND WHERE
7 THEY CROSS THE PROPERTY.

8
9 ANSWER: No.

10
11
12 QUESTION: ARE THERE CURRENT PLANS FOR OTHER UTILITY FEATURES
13 ON YOUR PROPERTY? IF SO, PLEASE DESCRIBE HOW AND WHERE THEY
14 CROSS THE PROPERTY.

15
16 ANSWER: No.

17
18 QUESTION: WOULD THE LINKS THAT MIGHT IMPACT YOUR PROPERTY
19 RUN ALONG ANY BOUNDARY LINES OF YOUR PROPERTY?

20
21 ANSWER: No. They directly bisect our property from South to North and then East to
22 West, through the middle of the entire property, essentially creating an "L" through two-
23 thirds of the middle of the property.

24
25
26 QUESTION: HOW WOULD A 345-KV ELECTRIC TRANSMISSION LINE
27 IMPACT YOUR PROPERTY AND ITS OPERATIONS?

28
29 ANSWER: Since the lines would directly bisect our property from South to North and
30 then East to West, through the middle of the entire property, essentially creating an "L"
31 through two thirds of the middle of the property, they would effectively ruin all of the
32 property.

33
34
35 QUESTION: WOULD YOU HAVE TO REGULARLY DRIVE UNDER THE
36 TRANSMISSION LINE IF INSTALLED ON YOUR PROPERTY.

37
38 ANSWER: Yes.

1 QUESTION: DESCRIBE THE AESTHETIC IMPACT TO YOUR PROPERTY IF
2 ONCOR BUILD A 345-KV TRANSMISSION LINE ON YOUR PROPERTY.

3
4 ANSWER: The lines would effectively ruin the aesthetic quality of living out in the
5 country and having a peaceful and serene retirement since we would have to stare at these
6 huge lines every day and live under constant bombardment of EMFs which are linked to
7 numerous health concerns.

8
9
10 QUESTION: IS THIS YOUR FIRST EFFORT TO COMMUNICATE YOUR
11 CONCERNS WITH ONCOR?

12
13 ANSWER: Yes
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, we have the general concerns of landowners who are required to
21 give third parties access to their property. I hope that Oncor will respect my 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. Health concerns are also preeminent. When
29 you google, "living under high voltage power lines" there are numerous warnings
30 regarding cancer, EMF, radiation, etc..

31
32
33 QUESTION: IS THERE ANYTHING ELSE YOU WOULD LIKE THE
34 ADMINISTRATIVE LAW JUDGE AND THE PUBLIC UTILITY COMMISSION TO
35 CONSIDER IN THIS PROCEEDING?

36
37 ANSWER: No.
38
39

1 **IV. CONCLUSION AND RECOMMENDATIONS**

2
3 QUESTION: HOW WOULD YOU SUMMARIZE YOUR POSITION IN THIS
4 PROCEEDING REGARDING ONCOR'S RECOMMENDED ROUTE 179 AND THE
5 PROPOSED ALTERNATIVE ROUTES?

6
7 ANSWER: I oppose any route using Segments M8, O8, O3 Q1, Q2, and Q5. We oppose
8 the Oncor's Routes 67, 68, and 69. I support Oncor's Recommended Route 179 as the
9 route that best meets the community values.

10
11
12 QUESTION: DOES THIS CONCLUDE YOUR TESTIMONY?

13
14 ANSWER: Yes.