



## **Filing Receipt**

**Filing Date - 2023-08-23 05:37:10 PM**

**Control Number - 55067**

**Item Number - 1722**

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

<b>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</b>	<b>§ § § § § § §</b>	<b>BEFORE THE STATE OFFICE  OF  ADMINISTRATIVE HEARINGS</b>
--	--	---

**MARGARET CHAVEZ’S NOTICE OF CROSS-EXAMINATION AND EXHIBIT LIST**

TO THE HONORABLE ADMINISTRATIVE LAW JUDGES:

COMES NOW, Margaret Chavez 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**

Margaret Chavez 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, Margaret Chavez 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.
Margaret Chavez Exhibit 1	Direct Testimony of Intervenor Margaret Chavez	1430

Respectfully submitted,

BRAUN & GRESHAM, PLLC

P.O. Box 1148 (Mailing)  
Dripping Springs, Texas 78620  
14101 Hwy. 290 W., Bldg. 1100 (Physical)  
Austin, Texas 78737  
512-894-5426 (telephone)  
512-894-3405 (fax)

/s/Patrick L. Reznik

Patrick L. Reznik

State Bar No. 16806780

[preznik@braungresham.com](mailto:preznik@braungresham.com)

Carly Barton

State Bar No. 24086063

[cbarton@braungresham.com](mailto:cbarton@braungresham.com)

**ATTORNEYS FOR MARGARET CHAVEZ**

**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

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

<b>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</b>	§ § § § § § §	<b>BEFORE THE STATE OFFICE  OF  ADMINISTRATIVE HEARINGS</b>
--	---------------------------------	---

**INTERVENOR MARGARET CHAVEZ’S EXHIBIT LIST**

EXHIBIT	DESCRIPTION	OFFERED	ADMITTED
Margaret Chavez Exhibit 1	Direct Testimony of Intervenor Margaret Chavez		

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

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

**DIRECT TESTIMONY OF INTERVENORS MARGARET CHAVEZ**

Intervenor Margaret Chavez files this Direct Testimony, which is attached. Margaret Chavez stipulates that this Direct Testimony can be treated by all parties as if the answers were filed under oath.

Respectfully submitted,

BRAUN & GRESHAM, PLLC  
P.O. Box 1148 (Mailing)  
Dripping Springs, Texas 78620  
14101 Hwy. 290 W., Bldg. 1100 (Physical)  
Austin, Texas 78737  
512-894-5426 (telephone)  
512-894-3405 (fax)

/s/Patrick L. Reznik  
Patrick L. Reznik  
State Bar No. 16806780  
[preznik@braungresham.com](mailto:preznik@braungresham.com)  
Carly Barton  
State Bar No. 24086063  
[cbarton@braungresham.com](mailto:cbarton@braungresham.com)

**ATTORNEYS FOR MARGARET & ANTONIO  
CHAVEZ**

**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

## **TABLE OF CONTENTS**

I.	INTRODUCTION .....	4
II.	PURPOSE AND SCOPE OF TESTIMONY .....	5
III.	DESCRIPTION OF PROPERTY AND THE LINE'S IMPACT .....	5
IV.	CONCLUSION AND RECOMMENDATIONS .....	10
	EXHIBIT A – MAP OF PROPERTY .....	6, 11
	EXHIBIT B – PHOTOS OF VIEW OF PROPERTY .....	8, 12

1 **I. INTRODUCTION**

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

5  
6 ANSWER: My name is Margaret Chavez, and my current address is 9701 Armour  
7 Drive, Fort Worth, Texas 76244-5374

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'm testifying behalf of myself and my husband Antonio Chavez.

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 HISTORYS.

25  
26 ANSWER: Antonio owns Chavez Mexican Foods Inc. This is a family corporation  
27 that owns 6 restaurants in the DFW area. Antonio and his brothers started this business in  
28 1998. I work as the Accountant/HR for all the restaurants as well. I have an Associates of  
29 Applied Science in Hotel Restaurant and Institutional Management from the University  
30 of Minnesota Crookston. Antonio and I have both worked in the restaurant industry for  
31 the majority of our careers.

32  
33  
34 QUESTION: WHERE IS YOUR PROPERTY LOCATED?

35  
36 ANSWER: My property is located at 15151 S County Line Rd.

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



1 ANSWER: I have owned the property for 3 years.

2  
3 QUESTION: ARE YOU FAMILIAR WITH THIS AREA OF TEXAS?

4  
5 ANSWER: Yes.

6  
7  
8 **II. PURPOSE AND SCOPE OF TESTIMONY**

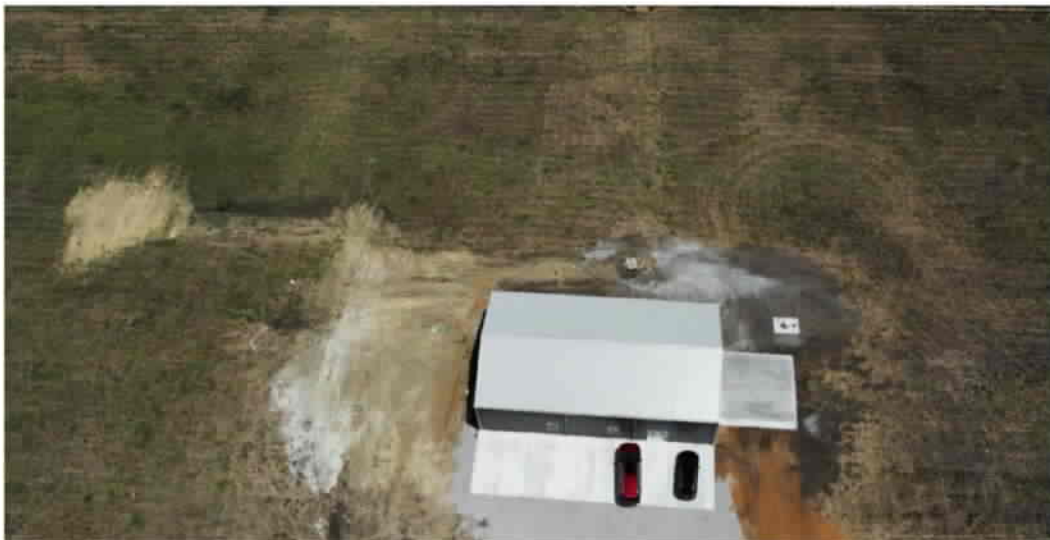
9  
10 QUESTION: WHAT IS THE PURPOSE AND SCOPE OF YOUR TESTIMONY?

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 Segments Q1, Q2, Q5, O8 and Routes 67, 68, and 69 which utilize  
15 these Segments.

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: Yes, we have one current structure that is roughly 3,700 sq. feet. With  
25 additional plans to add at least two more structures (homes). *See below.*



1  
2 QUESTION: PLEASE DESCRIBE YOUR PROPERTY'S TERRAIN AND ITS  
3 ECOLOGICAL OR BIOLOGICAL FEATURES.

4  
5 ANSWER: The terrain is relatively flat. The current house on the land has added  
6 significant value (249K) to the property.

7  
8  
9 QUESTION: PLEASE DESCRIBE YOUR PROPERTY'S CURRENT USES,  
10 INCLUDING BRIEFLY DESCRIBING ANY RANCH OR SPECIALIZED  
11 OPERATIONS.

12  
13 ANSWER: It is currently going to be used for our daughter's home. There are plans to  
14 add our retirement house in the back end of the property (within the next year). We also  
15 have plans to add animals (goats, chickens, etc.) to the property. The property is  
16 approximately 10 acres. **See Exhibit A.**

17  
18  
19 QUESTION: HAVE YOU OR YOUR FAMILY UNDERTAKEN ANY EFFORTS TO  
20 RESTOR THE LAND OR THE ENIRONMENTAL QUALIT OF THE PROPERTY?

21  
22 ANSWER: No.

23  
24 QUESTION: ARE THERE ANY WATER WELL SITES ON THE PROPERTY? IF SO,  
25 DESCRIBE THE GENRAL LOCATION.

26  
27 ANSWER: Yes, there is a well. It is next to the current structure on the property. It is  
28 outlined by the red circle. **See below.**



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

4  
5 ANSWER: No, there is not a gas well, there is a residential gas tank on the property.  
6

7 QUESTION: ARE THERE ANY PIPELINE EASEMENTS ON THE PROPERTY? IF  
8 SO, DESCRIBE THE GENERAL LOCATION.

9  
10 ANSWER: Yes, at the front end (The side facing S. County line Rd) of the property.

11 It runs north to south.  
12

13 QUESTION: PLEASE DESCRIBE ANY PLANNED FUTURE USES OF YOUR  
14 PROPERTY IF THOSE USES ARE DIFFERENT FROM THE CURRENT USES  
15 PREVIOUSLY DESCRIBED.

16  
17 ANSWER: The property will mainly be used as a retirement home for us and the  
18 possibility of adding at least three more houses, should our children decide to build on the  
19 property as well. Current plans are for three homes, but more could be added in the  
20 future.

21  
22 QUESTION: DO ANY EXISTING TRANSMISSION OR DISTRIBUTION LINES  
23 CROSS YOUR PROPERTY? IF SO, PLEASE DESCRIBE HOW AND WHERE  
24 THEY CROSS THE PROPERTY.

25  
26 ANSWER: The only existing lines are modest poles for delivery of electricity to the  
27 current home on the property. They run along the north end of the property.

28  
29 QUESTION: ARE THERE CURRENT PLANS FOR OTHER UTILITY FEATURES  
30 ON YOUR PROPERTY? IF SO, PLEASE DESCRIBE HOW AND WHERE THEY  
31 CROSS THE PROPERTY.

32  
33 ANSWER: Within 5 years, S. County Line Rd. will have access to public water lines  
34 for homes within city limits. We would be required to be within the city limits, because  
35 we plan to build more than one home on the 10-acre property. Therefore, yes, there will  
36 be public water lines installed sometime in the future.

1 QUESTION: WOULD THE SEGMENTS THAT MIGHT IMPACT YOUR  
2 PROPERTY RUN ALONG ANY BOUNDARY LINES OF YOUR PROPERTY?

3  
4 ANSWER: No, they would cross through the middle of the property.

5  
6 QUESTION: HOW WOULD A 345-KV ELECTRIC TRANSMISSION LINE  
7 IMPACT YOUR PROPERTY AND ITS OPERATIONS?

8  
9 ANSWER: This transmission line would impact the property value in a negative way.  
10 The area that our property is located is sought after for being a more rural type of living.  
11 Anyone potential buyers in the future would not want this on their property, nor do we.  
12 Secondly, we have health and safety concerns. The generation of the electromagnetic  
13 fields are a concern to us as our daughter's family (along with my grandchild) will be  
14 living on the property as well. We want our grandchildren to be able to run around freely  
15 without the worry of a dangerous transmission line going through the middle of our  
16 property. Not only the children, but also any animals we decide to bring on the property  
17 later. Next, the visual and noise impact. Right now we can see an unobstructed view of  
18 the skyline, this would greatly diminish that, and when looking out of the window from  
19 the property all we would see is the transmission line. **See Exhibit B.** Additionally, the  
20 current proposed line is next to a housing structure, and would possibly create unwanted  
21 noise, where currently it is peaceful and quiet. Lastly, the possibility of land use  
22 restriction, we bought this property to build on it how we see fit for our future, and my  
23 understanding is that this might change the way we can build on it in the future.

24  
25 QUESTION: WOULD YOU HAVE TO REGULARLY DRIVE UNDER THE  
26 TRANSMISSION LINE IF INSTALLED ON YOUR PROPERTY.

27  
28 ANSWER: Yes, given that our future home will be at the backend of the property and  
29 this proposed line goes through the middle of our property, I would drive under it on a  
30 daily basis. **See below.**



1  
2  
3  
4 QUESTION: DESCRIBE THE AESTHETIC IMPACT TO YOUR PROPERTY IF  
5 STEC INSTALLS A 345-KV TRANSMISSION LINE ON YOUR PROPERTY.

6  
7 ANSWER: Currently, on the property there is an unobstructed view of the skyline and  
8 scenery on the west end (where the sunsets), the line would be in the direct view of that.  
9 Not only would the line on our property obstruct the views, the neighboring properties  
10 that have plans to have the towers would obstruct any views we would have as well.

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

14  
15 ANSWER: Yes.

16  
17 QUESTION: IF THE TRANSMISSION LINE IS BUILT ON YOUR PROPERTY, DO  
18 YOU HAVE ANY CONCERNS ABOUT ONCOR HAVING ACCESS TO YOUR  
19 PROPERTY?

20  
21 ANSWER: Yes, I have the general concerns of landowners who are required to give  
22 third parties access to their property.

1 QUESTION: IF THE TRANSMISSION LINE IS BUILT ON YOUR PROPERTY, DO  
2 YOU HAVE ANY OTHER CONCERNS?

3  
4 ANSWER: Yes, I am seriously concerned about devaluation to my property and my  
5 community as a result of this proposed line.

6  
7  
8 **IV. CONCLUSION AND RECOMMENDATIONS**  
9

10 QUESTION: HOW WOULD YOU SUMMARIZE YOUR POSITION IN THIS  
11 PROCEEDING REGARDING ONCOR'S RECOMMENDED ROUTE 179 AND THE  
12 PROPOSED ALTERNATIVE ROUTES?

13  
14 ANSWER: I specifically oppose any route using Segments Q1, Q2, Q5, and O8 and  
15 Routes 67, 68, and 69. I fully support Oncor's Recommended Route 179.

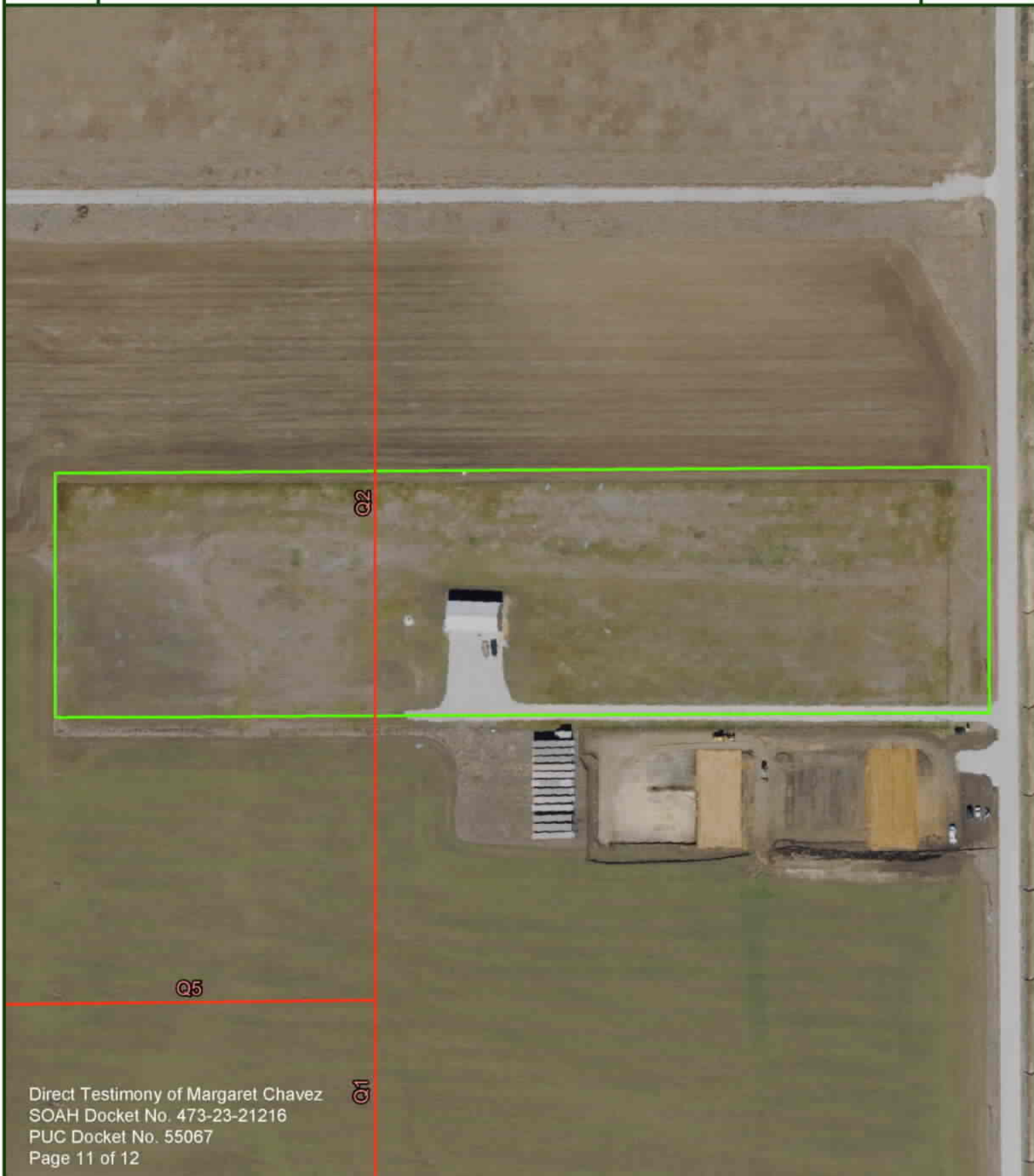
16  
17  
18 QUESTION: DOES THIS CONCLUDE YOUR TESTIMONY?

19  
20 ANSWER: Yes.





Antonio and Margaret Chavez  
+/- 10.000 Acres - Denton County



Direct Testimony of Margaret Chavez  
SOAH Docket No. 473-23-21216  
PUC Docket No. 55067  
Page 11 of 12

## EXHIBIT B

