



## **Filing Receipt**

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**Item Number - 1723**

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

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

**DAVID BRATTON’S NOTICE OF CROSS-EXAMINATION AND EXHIBIT LIST**

TO THE HONORABLE ADMINISTRATIVE LAW JUDGES:

COMES NOW, David Bratton 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**

David Bratton 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, David Bratton 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. |
|----------------------------|---|-----------------|
| David Bratton<br>Exhibit 1 | Direct Testimony of Intervenor<br>David Bratton | 1431            |

Respectfully submitted,

BRAUN & GRESHAM, PLLC

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/s/Patrick L. Reznik

Patrick L. Reznik

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**ATTORNEYS FOR DAVID BRATTON**

**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 DAVID BRATTON'S EXHIBIT LIST**

| EXHIBIT                    | DESCRIPTION                                     | OFFERED | ADMITTED |
|----------------------------|---|---------|----------|
| David Bratton<br>Exhibit 1 | Direct Testimony of Intervenor David<br>Bratton |         |          |

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

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

**DIRECT TESTIMONY OF INTERVENOR DAVID BRATTON**

Intervenor David Bratton files this Direct Testimony, which is attached. David Bratton 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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/s/Patrick L. Reznik  
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**ATTORNEYS FOR DAVID BRATTON**

DAVID BRATTON 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 David Bratton and my current address is PO Box 428,  
7 Almont, CO 81210.

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 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 HISTORYS.

25  
26 ANSWER: I am the Vice President and part owner of Bratton Steel, LP located in  
27 Dallas, TX. I received a Bachelor's degree from the University of North Texas, Denton,  
28 TX and an MBA degree from the University of Texas, Austin, TX.

29  
30  
31 QUESTION: WHERE IS YOUR PROPERTY LOCATED?

32  
33 ANSWER: 15377 S. County Line Rd., Justin, TX consisting of around 60 acres, with  
34 approximately 20 acres located in Denton County, and approximately 40 acres in Wise  
35 County.

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

1 ANSWER: I have owned it since September 2018. Prior to that the property was  
2 owned by my parents, J W Bratton and Geneva Bratton. Prior to their ownership it was  
3 owned by my maternal grandparents. The property has been in the family for over 100  
4 years.

5  
6 QUESTION: ARE YOU FAMILIAR WITH THIS AREA OF TEXAS?

7  
8 ANSWER: Yes  
9

10  
11 **II. PURPOSE AND SCOPE OF TESTIMONY**  
12

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

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

18  
19  
20 **III. DESCRIPTION OF PROPERTY AND THE LINE'S IMPACT**  
21

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

25  
26 ANSWER: Yes, a house which is currently a home to members of our family.  
27

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

31  
32 ANSWER: The property is primarily rolling hill pastureland. The house sits on a hill,  
33 which is the highest point of the property, with vistas in all directions. The views will be  
34 severely impacted by the proposed line. The main vistas from the house, to the south and  
35 east, will be looking directly at the proposed line. **See Exhibit A.**

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

1  
2 ANSWER: The property is currently a home for family members. The property is also  
3 used for cattle and hay production.

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

7  
8 ANSWER: The property has been seeded multiple times to restore the property to  
9 productive grasslands. We have also built ponds (tanks) to provide water for livestock.

10  
11 QUESTION: ARE THERE ANY WATER WELL SITES ON THE PROPERTY? IF SO,  
12 DESCRIBE THE GENERAL LOCATION.

13  
14 ANSWER: Yes, there is one water well which is approximately 100ft behind the main  
15 house on the property.

16  
17 QUESTION: ARE THERE ANY GAS WELLS ON THE PROPERTY? IF SO,  
18 DESCRIBE THE GENERAL LOCATION.

19  
20 ANSWER: There are no gas wells on the property. There are gas wells immediately  
21 bordering our property.

22  
23 QUESTION: ARE THERE ANY PIPELINE EASEMENTS ON THE PROPERTY? IF  
24 SO, DESCRIBE THE GENERAL LOCATION.

25  
26 ANSWER: Yes. There is a gas pipeline easement at the southeast corner of the property.

27  
28 QUESTION: PLEASE DESCRIBE ANY PLANNED FUTURE USES OF YOUR  
29 PROPERTY IF THOSE USES ARE DIFFERENT FROM THE CURRENT USES  
30 PREVIOUSLY DESCRIBED.

31  
32 ANSWER: We are planning a future housing development.

33  
34  
35 QUESTION: DO ANY EXISTING TRANSMISSION OR DISTRIBUTION LINES  
36 CROSS YOUR PROPERTY? IF SO, PLEASE DESCRIBE HOW AND WHERE  
37 THEY CROSS THE PROPERTY.

38  
39 ANSWER: No  
40

1 QUESTION: ARE THERE CURRENT PLANS FOR OTHER UTILITY FEATURES  
2 ON YOUR PROPERTY? IF SO, PLEASE DESCRIBE HOW AND WHERE THEY  
3 CROSS THE PROPERTY.

4  
5 ANSWER: Not to my knowledge.

6  
7 QUESTION: WOULD THE SEGMENTS THAT MIGHT IMPACT YOUR  
8 PROPERTY RUN ALONG ANY BOUNDARY LINES OF YOUR PROPERTY?

9  
10 ANSWER: The proposed link directly crosses our property.

11  
12 QUESTION: HOW WOULD A 345-KV ELECTRIC TRANSMISSION LINE  
13 IMPACT YOUR PROPERTY AND ITS OPERATIONS?

14  
15 ANSWER: It would destroy the existing views from our home, would severely limit  
16 current cattle and hay production, could have possible health consequences to our family,  
17 would severely limit plans for future housing development, and would have a severe  
18 impact on the value of our property.

19  
20 QUESTION: WOULD YOU HAVE TO REGULARLY DRIVE UNDER THE  
21 TRANSMISSION LINE IF INSTALLED ON YOUR PROPERTY.

22  
23 ANSWER: Yes, it would cross over the drive to our home.

24  
25 QUESTION: DESCRIBE THE AESTHETIC IMPACT TO YOUR PROPERTY IF  
26 STEC INSTALLS A 345-KV TRANSMISSION LINE ON YOUR PROPERTY.

27  
28 ANSWER: It would destroy both the views from our home as well as the scenic and  
29 economic value of the property.

30  
31 QUESTION: IS THIS YOUR FIRST EFFORT TO COMMUNICATE YOUR  
32 CONCERNS WITH ONCOR?

33  
34 ANSWER: Yes

35  
36 QUESTION: IF THE TRANSMISSION LINE IS BUILT ON YOUR PROPERTY, DO  
37 YOU HAVE ANY CONCERNS ABOUT ONCOR HAVING ACCESS TO YOUR  
38 PROPERTY?

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

3  
4 QUESTION: IF THE TRANSMISSION LINE IS BUILT ON YOUR PROPERTY, DO  
5 YOU HAVE ANY OTHER CONCERNS?

6  
7 ANSWER: Yes, I am seriously concerned about devaluation to my property and my  
8 community as a result of this proposed line.

9  
10  
11 **IV. CONCLUSION AND RECOMMENDATIONS**  
12

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

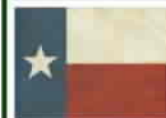
16  
17 ANSWER: I specifically oppose any route using Segments M8, O3, O8, Q1, Q2, and Q5  
18 and Routes 67, 68, and 69. I fully support Oncor's Recommended Route 179.

19  
20  
21 QUESTION: DOES THIS CONCLUDE YOUR TESTIMONY?

22  
23 ANSWER: Yes.



**David C. Bratton**  
**+/- 59.277 Acres - Denton and Wise Counties**



Direct Testimony of Intervenor David Bratton  
SOAH Docket No. 473-23-21216  
PUC Docket No. 55067  
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