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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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GFAT, LLC’S NOTICE OF CROSS-EXAMINATION AND EXHIBIT LIST

TO THE HONORABLE ADMINISTRATIVE LAW JUDGES:

COMES NOW, GFAT, LLC 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

GFAT, LLC 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, GFAT, LLC 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.
GFAT, LLC Exhibit 1	Direct Testimony of Paul Glasgow on Behalf of Intervenor GFAT, LLC	1429

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

Carly Barton

State Bar No. 24086063

cbarton@braungresham.com

ATTORNEYS FOR GFAT, LLC

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**

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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INTERVENOR GFAT LLC’S EXHIBIT LIST

EXHIBIT	DESCRIPTION	OFFERED	ADMITTED
GFAT, LLC Exhibit 1	Direct Testimony of Intervenor Paul Glasgow on Behalf of Intervenor GFAT, LLC		

**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 – DUNA HM 345-KV TRANSMISSION LINE IN DENTON AND WISE COUNTIES	§ § § § § § §	BEFORE THE STATE OFFICE OF ADMINISTRATIVE HEARINGS
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DIRECT TESTIMONY OF PAUL GLASGOW FOR INTERVENOR GFAT, LLC

Paul Glasgow on behalf of Intervenor GFAT, LLC 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
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
Carly Barton
State Bar No. 24086063
cbarton@braungresham.com

ATTORNEYS FOR GFAT, LLC

GFAT, LLC 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: Paul Glasgow, 8858 Dickens Ave, Surfside, FL 33154
7

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

12
13 ANSWER: Yes. I am testifying on behalf of Intervenor GFAT, LLC.
14

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

18
19 ANSWER: No.
20

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

24
25 ANSWER: I am the president of Nomad LLC, a live event production company located
26 in Ponder TX, I am a high school graduate with some college. I have worked in the live
27 event industry for 41 years and have been involved in over 6000 live events.
28

29
30 QUESTION: WHERE IS YOUR PROPERTY LOCATED?

31
32 ANSWER: 15137 S County Line Road
33

34
35 QUESTION: HOW LONG HAVE YOU OWNED THE PROPERTY?

36
37 ANSWER: Since August of 2020 – 3 years
38

39
40 QUESTION: ARE YOU FAMILIAR WITH THIS AREA OF DENTON AND WISE
41 COUNTIES, TEXAS?
42

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 any route that uses Segments M8, O3, O8, Q1, Q2, and Q5 and Routes
11 67, 68, and 69.
12
13

14 **III. DESCRIPTION OF PROPERTY AND THE LINE'S IMPACT**
15
16

17 QUESTION: ARE THERE ANY HABITABLE STRUCTURES ON THE
18 PROPERTY?
19

20 ANSWER: Yes, we are 90% finished with two 5950 sq ft buildings designed for
21 industrial rentals.
22
23

24 QUESTION: PLEASE DESCRIBE YOUR PROPERTY'S TERRAIN AND ITS
25 ECOLOGICAL OR BIOLOGICAL FEATURES.
26

27 ANSWER: Mostly flat with a slight fall towards the south of about 3-4 feet. ***See Exhibit***
28 **A.**
29

30 QUESTION: PLEASE DESCRIBE YOUR PROPERTY'S CURRENT USES.
31

32 ANSWER: Commercial buildings spaces available for rent with 14 more lots to be
33 developed. ***See Exhibit B.***
34

35 QUESTION: HAVE YOU OR YOUR FAMILY UNDERTAKEN ANY EFFORTS TO
36 RESTORE THE LAND OR THE ENVIRONMENTAL QUALITY OF THE
37 PROPERTY?
38

1 ANSWER: We currently lease the undeveloped portion to a local farmer.

2
3
4 QUESTION: ARE THERE ANY WATER WELL SITES ON THE PROPERTY? IF
5 SO, DESCRIBE THE GENERAL LOCATION.

6
7 ANSWER: No.

8
9 QUESTION: ARE THERE ANY GAS WELLS ON THE PROPERTY? IF SO,
10 DESCRIBE THE GENERAL LOCATION.

11
12 ANSWER: No.

13
14
15 QUESTION: ARE THERE ANY PIPELINE EASEMENTS ON THE PROPERTY? IF
16 SO, DESCRIBE THE GENERAL LOCATION.

17
18 ANSWER: Yes, there is a high-pressure gas pipeline easement along S County Line
19 Road.

20
21 QUESTION: PLEASE DESCRIBE THE CURRENT AND PLANNED FUTURE
22 USES OF YOUR PROPERTY AND HOW THOSE USES CONTRIBUTE TO THE
23 COMMUNITY VALUES OF DENTON AND WISE COUNTIES, TEXAS?

24
25 ANSWER: We are in an area of exponential growth and our property is one of the only
26 commercial sites available. New growth will require spaces for businesses to serve the
27 local community and our plans are to build facilities to meet those needs.

28
29 QUESTION: DO ANY EXISTING TRANSMISSION OR DISTRIBUTION LINES
30 CROSS YOUR PROPERTY? IF SO, PLEASE DESCRIBE HOW AND WHERE
31 THEY CROSS THE PROPERTY.

32
33 ANSWER: No.

34
35
36 QUESTION: ARE THERE CURRENT PLANS FOR OTHER UTILITY FEATURES
37 ON YOUR PROPERTY? IF SO, PLEASE DESCRIBE HOW AND WHERE THEY
38 CROSS THE PROPERTY.

1 ANSWER: We will need normal electric service to the buildings and water lines to feed
2 the buildings originating from S County Line Road.

3
4 QUESTION: WOULD THE LINKS THAT MIGHT IMPACT YOUR PROPERTY
5 RUN ALONG ANY BOUNDARY LINES OF YOUR PROPERTY?

6
7 ANSWER: No, they cross the middle of our 20 acres and then split north and south in the
8 center of the 20 acres.

9
10 QUESTION: HOW WOULD A 345-KV ELECTRIC TRANSMISSION LINE
11 IMPACT YOUR PROPERTY AND ITS OPERATIONS?

12
13 ANSWER: A 100' easement would kill some of our lots as we would not be able to build
14 buildings underneath them. *See Exhibit B.* Many businesses would be affected by the
15 EMF radiation and a potential customer choosing between 2 locations might select a
16 different area because of these power lines.

17
18
19 QUESTION: WOULD YOU HAVE TO REGULARLY DRIVE UNDER THE
20 TRANSMISSION LINE IF INSTALLED ON YOUR PROPERTY.

21
22 ANSWER: Yes.

23
24 QUESTION: DESCRIBE THE AESTHETIC IMPACT TO YOUR PROPERTY IF
25 ONCOR BUILD A 345-KV TRANSMISSION LINE ON YOUR PROPERTY.

26
27 ANSWER: We are building spaces for professionals and these type of lines would
28 negatively impact the openness and aesthetic feel and look of the business park.

29
30 QUESTION: DESCRIBE THE ENVIRONMENTAL IMPACT, SPECIFIC TO THIS
31 AREA, THAT WOULD BE CAUSED BY THIS TRANSMISSION LINE.

32
33 ANSWER: The constant buzzing and static electricity would not be pleasing to work
34 under and around all day. The wide-open sky would be negatively impacted as you look
35 across our property.

1 QUESTION: IF THE TRANSMISSION LINE IS BUILT ON YOUR PROPERTY, DO
2 YOU HAVE ANY CONCERNS ABOUT ONCOR HAVING ACCESS TO YOUR
3 PROPERTY?

4
5 ANSWER: Yes, we have the general concerns of landowners who are required to
6 give third parties access to their property. Also, this would materially affect the use of
7 our property. I hope that Oncor will respect my property.

8
9
10 QUESTION: IF THE TRANSMISSION LINE IS BUILT ON YOUR PROPERTY, DO
11 YOU HAVE ANY OTHER CONCERNS?

12
13 ANSWER: In addition to the detail already provided on other answers in this written
14 testimony, we have general safety and health concerns for living around transmission
15 lines and EMF issues. Because potential buyers may be aware of medical studies
16 available on the Internet arguing, correctly or not, a connection between high-powered
17 transmission lines causing health problems and possible cancer, we are concerned about a
18 negative stigma being attached to our property and the possible devaluation of our
19 property value. In addition, the buzzing sounds emanating from high-voltage
20 transmission lines would be bothersome for people living near them.

21
22
23 QUESTION: IS THERE ANYTHING ELSE YOU WOULD LIKE THE
24 ADMINISTRATIVE LAW JUDGE AND THE PUBLIC UTILITY COMMISSION TO
25 CONSIDER IN THIS PROCEEDING?

26
27 ANSWER: No.

28
29
30 **IV. CONCLUSION AND RECOMMENDATIONS**

31
32 QUESTION: HOW WOULD YOU SUMMARIZE YOUR POSITION IN THIS
33 PROCEEDING REGARDING ONCOR'S RECOMMENDED ROUTE 179 AND THE
34 PROPOSED ALTERNATIVE ROUTES?

1 ANSWER: We adamantly oppose any route using Segments M8, O8, O3 Q1, Q2, and
2 Q5. We oppose the Oncor's Routes 67, 68, and 69. We support Oncor's Recommended
3 Route 179 as the route that best meets the community values.

4

5

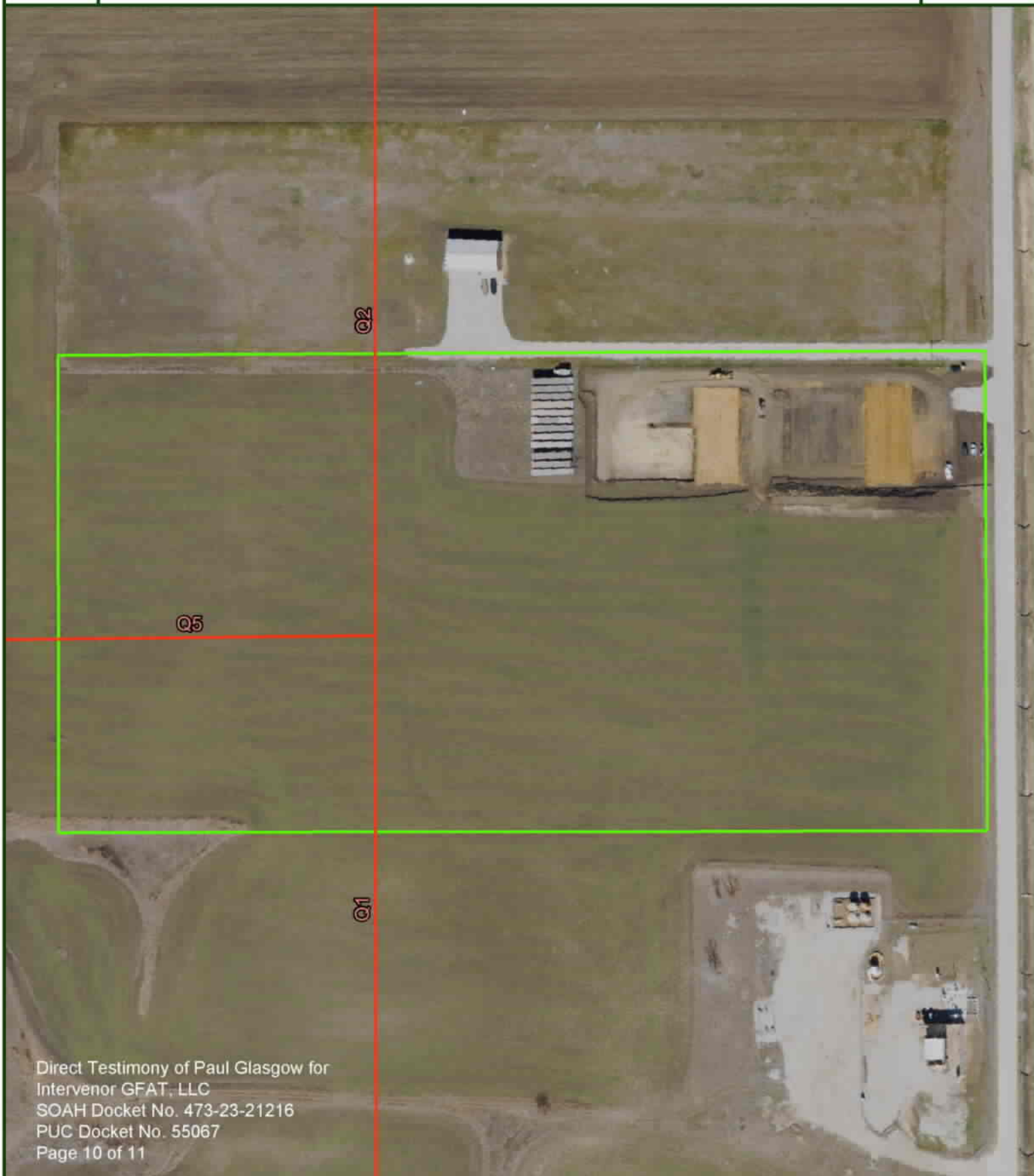
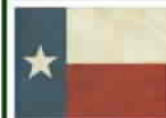
6 QUESTION: DOES THIS CONCLUDE YOUR TESTIMONY?

7

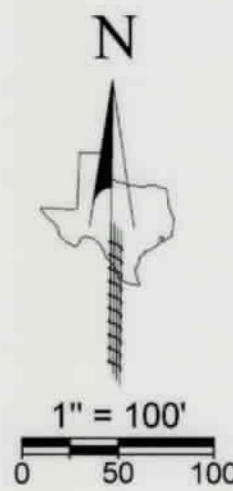
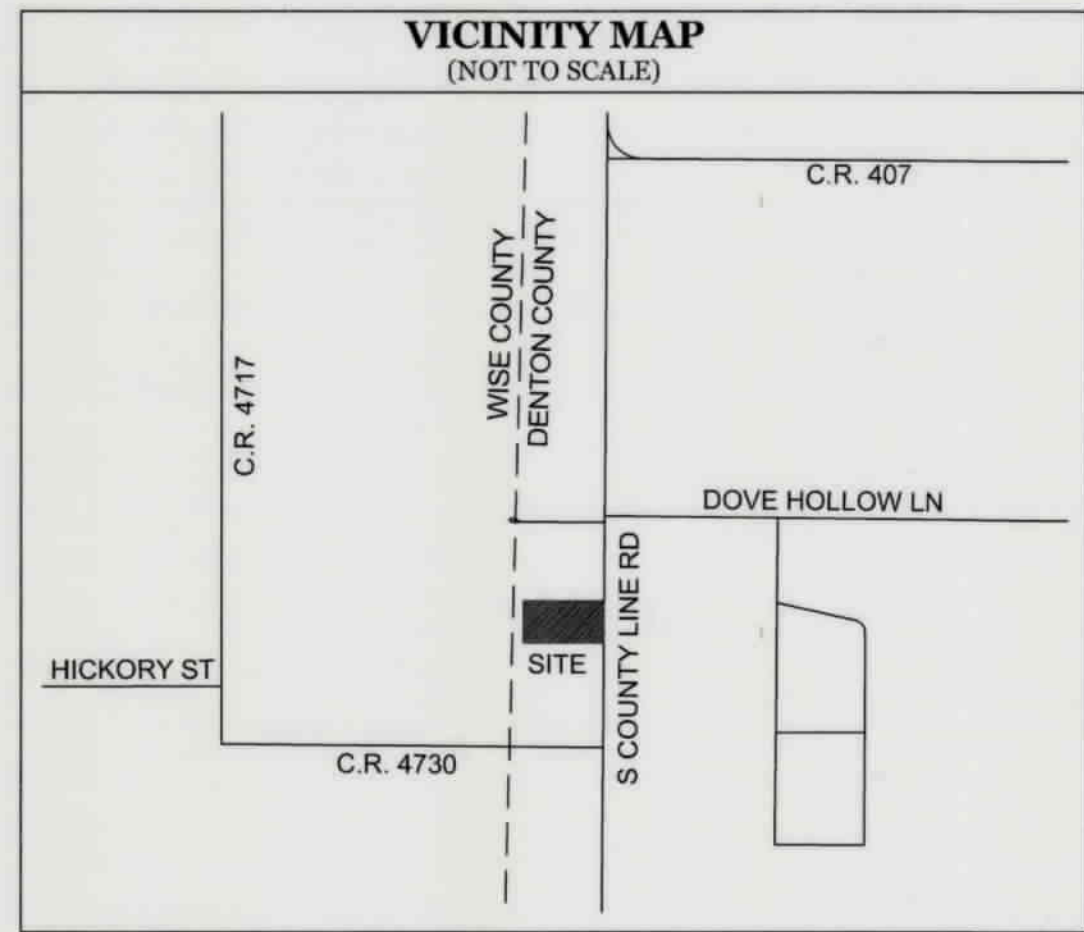
8 ANSWER: Yes.



GFAT, LLC
+/- 19.440 Acres - Denton County



Direct Testimony of Paul Glasgow for
Intervenor GFAT, LLC
SOAH Docket No. 473-23-21216
PUC Docket No. 55067
Page 10 of 11



GENERAL NOTES

- The purpose of this plat is to create 16 lots from two tracts of land and to dedicate easements and right-of-way.
- This property is located in "Non-shaded Zone X" according to the F.E.M.A. Flood Insurance Rate Map dated April 18, 2011 as shown on Map Number 48121C0460G.
- The grid coordinates shown on this plat are based on GPS observations utilizing the AllTerra RTK Network. North American Datum of 1983 (Adjustment Realization 2011).
- Selling a portion of this addition by metes and bounds is a violation of City Ordinance and State Law, and is subject to fines and/or withholding of utilities and building permits.
- The bearings shown on this plat are based on GPS observations utilizing the AllTerra RTK Network. North American Datum of 1983 (Adjustment Realization 2011).
- 36' Private Street/Public Access, Utility & Fire Lane Easement will be maintained by the property owners or property owners association and will NOT be maintained by the City of New Fairview or Denton County.
- Water services are to be provided by private wells.
- Septic services are to be provided by private septic systems.

LINE TABLE		
LINE	BEARING	DISTANCE
L1	N 89°54'55" W	34.60'
L2	N 89°54'55" W	357.03'
L3	S 00°05'05" E	20.00'
L4	N 89°54'55" W	24.00'
L5	N 00°05'05" E	20.00'
L6	N 89°54'55" W	16.00'
L7	N 00°05'05" E	30.00'
L8	N 89°54'55" W	74.25'
L9	N 00°05'05" E	265.00'
L10	N 89°54'55" W	963.76'
L11	S 89°54'55" E	1067.11'
L12	N 89°54'55" W	19.45'
L13	S 00°05'05" W	205.00'
L14	S 89°54'55" E	20.17'

CURVE TABLE				
CURVE	ARC LENGTH	RADIUS	DELTA ANGLE	CHORD BEARING
C1	32.56'	30.00'	62°10'55"	N 58°49'27" W
C2	32.56'	30.00'	62°10'55"	N 58°49'27" W
C3	47.12'	30.00'	90°00'00"	S 45°05'05" W
C4	47.12'	30.00'	90°00'00"	N 44°54'55" W
C8	47.12'	30.00'	90°00'00"	N 44°54'55" W
C9	19.56'	20.00'	56°01'32"	S 62°04'19" W
C10	24.67'	48.00'	292°03'04"	N 00°05'05" E
C11	19.56'	20.00'	56°01'32"	S 61°54'09" E
C12	47.12'	30.00'	90°00'00"	S 45°05'05" W
C13	47.12'	30.00'	90°00'00"	S 44°54'55" E

Project	1608.021-16	 EAGLE SURVEYING, LLC 210 S. Elm Street, Suite: 104 Denton, TX 76201 (940) 222-3009 TX Firm #10194177
Date	03/09/2021	
Drafter	TAR/CHM	

SURVEYOR
Eagle Surveying, LLC
Contact: Tyler Rank
210 S. Elm Street, Suite: 104
Denton, TX 76201
(940) 222-3009

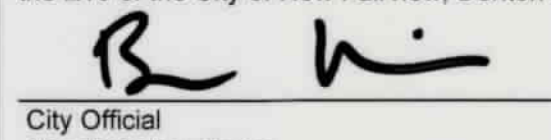

ENGINEER
Development Engineering Consultants, LLC
Contact: Daniel Stewart, P.E.
2591 Dallas Parkway, Suite 300
Frisco, TX 75034
(972) 731-4354

OWNER
GFAT, LLC
8959 Dickens Ave
Surfside, FL 33154

LEGEND

POB = POINT OF BEGINNING
IRF = IRON ROD FOUND
CIRF = CAPPED IRON ROD FOUND
CIRS = CAPPED IRON ROD SET
"EAGLE SURVEYING"
DOC. NO. = DOCUMENT NUMBER
R.O.W. = RIGHT-OF-WAY
O.R.D.C.T. = OFFICIAL RECORDS, DENTON COUNTY, TEXAS

CERTIFICATE OF APPROVAL

On this 20th day of July, 2021, New Fairview, Texas
hereby **APPROVES** the foregoing Plat of **COUNTY LINE BUSINESS PARK**, an addition to the ETJ of the City of New Fairview, Denton County, Texas, submitted by GFAT, LLC, owner.

City Official
New Fairview, Texas

City Secretary
New Fairview, Texas

FINAL PLAT COUNTY LINE BUSINESS PARK LOTS 1-16, BLOCK 1 19.99 ACRES

G.B. BUCHANAN SURVEY, ABSTRACT No. 32,
ETJ OF THE CITY OF NEW FAIRVIEW,
DENTON COUNTY, TEXAS

OWNER'S CERTIFICATE & DEDICATION

STATE OF TEXAS §
COUNTY OF DENTON §

WHEREAS, GFAT, LLC, is the owner of a 19.99 acre tract of land situated in the G.B. BUCHANAN SURVEYING, ABSTRACT NO. 32 in Denton County, Texas, being all of that called 2.00 acre tract of land conveyed to GFAT, LLC, recorded in Document Number 2020-159678 of the Official Records of Denton County, Texas, and being all of that called 17.99 acre tract of land conveyed to GFAT, LLC, by deed of record in Document Number 2020-159678 of said Official Records, and being more particularly described by metes and bounds as follows:

BEGINNING at a 1/2" iron rod found at the Southwest corner of said 17.99 acre tract and the common Northwest corner of a called 52.55 acre tract of land conveyed to Rama Prasad Chalasani and wife, Uma Devi Chalasani, Vivek Chalasani and wife, Sri Haritha Vardhini Nekkanti and Rajiv Chalasani, recorded in Document Number 2018-36282 of said Official Records, and being in the East line of a called 140.18 acre tract of land conveyed to Matthew Spaethe, recorded in document number 2016-104801 of said Official Records, from which a 1/2" iron rod found at an angle point in the West line of said 52.55 acre tract and the common East line of said 140.18 acre tract bears South 00°12'33" West, a distance of 467.28 feet;

THENCE North 00°12'33" East, with the West line of said 17.99 acre tract and the common East line of said 140.18 acre tract, a distance of 669.94 feet to a capped 1/2" iron rod stamped "EAGLE SURVEYING" set at the Southwest corner of a called 10.00 acre tract conveyed to Antonio and Margaret Chavez by deed of record in Document Number 2020-89115 of said Official Records, also being the Northwest corner of said 17.99 acre tract and hereof, from which a 1/2" iron rod found at the Northwest corner of said 10.00 acre remainder tract bears North 00°12'33" East, a distance of 335.75 feet;

THENCE South 89°54'55" East, with the South line of said 10.00 acre tract, being in part the common North line of said 17.99 acre tract, and in part the common North line of said 2.00 acre tract, a distance of 1298.22 feet to an x-cut found in South County Line Road, also being the Southeast corner of said 10.00 acre tract, and being the Northeast corner of said 2.00 acre tract and hereof;

THENCE South 00°04'13" East, along South County Line Road, being in part the East line of said 2.00 acre tract, and in part the East line of said 17.99 acre tract, a distance of 669.94 feet to an x-cut found at the Northeast corner of said 52.55 acre tract, also being the Southeast corner of said 17.99 acre tract and hereof;

THENCE North 89°54'55" West, with the South line of said 17.99 acre tract and the common North line of said 52.55 acre tract, a distance of 1301.49 feet to the **POINT OF BEGINNING** and containing 19.99 acres of land more or less.

NOW THEREFORE KNOW ALL MEN BY THESE PRESENTS:

THAT, GFAT, LLC, does hereby adopt this plat, designating herein described property as **COUNTY LINE BUSINESS PARK**, an addition to the City of New Fairview, Denton County, Texas, and does hereby dedicate to public use forever all streets, alleys, parks, watercourses, drains, easements and public places thereon shown for the purpose and consideration therein expressed.

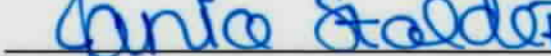
OWNER: GFAT, LLC

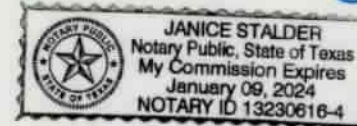
BY: 
Date 7/16/21

STATE OF Texas §
COUNTY OF Denton §

BEFORE ME, the undersigned authority, on this day personally appeared Paul Glasgow, known to me to be the person whose name is subscribed to the foregoing instrument, and acknowledged to me that she executed the same for the purposes and considerations therein expressed and in the capacity therein stated.

GIVEN UNDER MY HAND AND SEAL OF THE OFFICE this 16th day of July, 2021.


Notary Public in and for the State of Texas



CERTIFICATE OF SURVEYOR

STATE OF TEXAS §
COUNTY OF DENTON §

I, **MATTHEW RAABE**, Registered Professional Land Surveyor, do hereby certify that this plat was prepared from an actual survey made on the ground and that the monuments shown hereon were found or placed with 1/2-inch iron rods with green plastic caps stamped "EAGLE SURVEYING" under my direction and supervision in accordance with the current provisions of the Texas Administrative Code and the Ordinances of the City of New Fairview, Denton County, Texas.


Matthew Raabe, R.P.L.S. # 6402

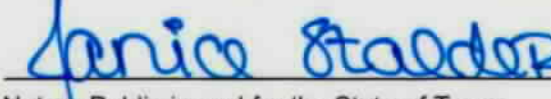


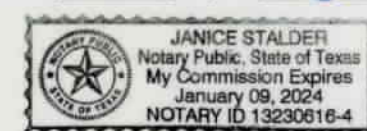
Date 7-9-21

STATE OF TEXAS §
COUNTY OF DENTON §

BEFORE ME, the undersigned authority, on this day personally appeared **MATTHEW RAABE**, known to me to be the person whose name is subscribed to the foregoing instrument, and acknowledged to me that he executed the same for the purposes and considerations therein expressed and in the capacity therein stated.

GIVEN UNDER MY HAND AND SEAL OF THE OFFICE this 9th day of July, 2021.


Notary Public in and for the State of Texas



Filed for Record
in the Official Records Of:
Denton County
On: 7/28/2021 2:52:37 PM
in the PLAT Records
COUNTY LINE BUSINESS PARK
Doc Number: 2021-295
Number of Pages: 1
Amount: 50.00
Order#: 20210728000770
By: PM