



Filing Receipt

Filing Date - 2023-09-07 01:55:26 PM

Control Number - 55067

Item Number - 1780

**SOAH Docket No. 473-23-21216
PUC DOCKET No. 55067**

APPLICATION OF ONCOR ELECTRIC	^	BEFORE THE STATE OFFICE
DELIVERY LLC TO AMEND ITS	^	
CERTIFICATE OF CONVENIENCE	^	OF
AND NECESSITY FOR THE RAMHORN	^	
HILL-DUNHAM 345-KV TRANSMISSION	^	
LINE IN DENTON COUNTY	^	ADMINISTRATIVE HEARINGS

**INTERVENORS ROBERT L AND MARTHA J VINYARD'S POST
HEARING BRIEF**

Intervenors Robert L. and Martha J. Vinyard (collectively referred to as
"Vinyard's"), file this Post-Hearing Brief.

INTRODUCTION AND SUMMARY

Robert and Martha Vinyard respectfully urge the Administrative Law Justices(ALJ) to not recommend to the Public Utility Commission of Texas (PUCT) approval of the "Best Meets" route 179 or any route whose path includes Link J3. Use of this Link would have a negative impact on the Legacy Ranch community values and southern Justin residential and commercial development. Additionally, multiple structural pole/line turns of the Oncor transmission line through the Legacy Ranch community certainly increases the cost of building out Link J3.

ARGUMENT

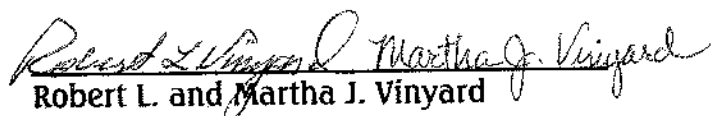
During the hearing, Oncor stated transmission line route selection requires balancing a number of factors to include proximity to habitable structures, cost constraints, and aesthetics.

The proposed Link J3 follows a zig zag pattern through the recently established neighborhood of Legacy Ranch. Due to this installation pattern and proximity to homes, no other link in the entire study area impacts a neighborhood more than Link J3. As an Oncor representative, Ms. Perkins said in her rebuttal testimony, every turning structure increases the cost of establishing the transmission line. as this link bisects Legacy Ranch it would require three(3) turning structures and consume nearly the entire community green space as each turning structure requires a much larger easement/footprint. Two of these large monopoles would be approximately sixty(60) yards from existing homes. Furthermore, as J3 heads east connecting through Link H8, another three(3) turning structures would be required. This totals six(6) turning structures within approximately one mile, making the J3 – H8 segments of Route 179 more than likely the most expensive span on the route.

Alternatively, Segment J22 has more habitable/business structures than J3, however, 73% of those structures are more than 300 feet from centerline. On the other hand, J3 has fewer habitable structures, but 42% of them are less than 300 feet from centerline. Legacy Ranch homes are closer in proximity to the power lines

than J22 and the zig zag pattern makes the lines more costly and aesthetically unpleasing from every angle. How is that balancing the factors stated by Oncor? The Vinyard's along with the other residents of Legacy Ranch propose moving the power lines south to Link J22. Only one intervenor at the hearing opposed J22 – Hillwood parties. However, Hillwood stated they would possibly accept a route that included segments I6, J1, and J21 if those segments were modified and moved further west, closer to Highway FM156 and the railroad ROW. The Vinyard's believe this could be a viable option for Oncor approval. During the hearing, Oncor was able to reach tentative agreements with several intervening parties to adjust/move the transmission lines in other areas of concern. Due to witnessed cooperation, we implore route J22, J21, J1, I6, H8 instead of moving north to include J3 or any other segment north of J22. Furthermore, J22 follows a railroad ROW for a majority of the proposed route whereas J3 bisects a neighborhood and would take up nearly all of the community green space the neighborhood enjoys. Due to the aforementioned reasons, the Vinyard's do not support the "Best Meets" route or any other route that includes Link J3. We respectfully request consideration of this modification proposal.

Respectfully submitted.


Robert L. and Martha J. Vinyard

Dated: September 7, 2023