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APPLICATION OF BRAZOS § BEFORE THE STATE OFFICE  
ELECTRIC POWER COOPERATIVE, §  
INC. TO AMEND ITS CERTIFICATE §  
OF CONVENIENCE AND NECESSITY § OF  
FOR THE BEECHAM GAP 138-KV §  
TRANSMISSION LINE IN LAMPASAS §  
AND CORYELL COUNTIES § ADMINISTRATIVE HEARINGS

DIRECT TESTIMONY OF  
*of*  
JEFF COATS

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**I. INTRODUCTION**

**Q Please state your name and address.**

A. "My name is Jeff Coats. My mailing address is 7705 Avondale, McKinney, Texas 75070."

**Q. Please describe your background, profession and/or experience.**

A. "I am real estate agent specializing in the sale of residential properties and ranches. I have over 40 years of extensive experience in the real estate and in residential development industry. In my 40 year career in real estate, I have sold properties in 28 counties and 119 cities in Texas and have closed to \$700 million in transactional sales. I have been named a D Magazine Top Producer and Best Real Estate agent for over 22 years, I grew up in the Dallas area but spent many weekends our Kempner ranch as a reprieve from a busy industry.

**Q. Please describe your history with the property potentially affected.**

A. "This property was purchased by my family many years ago in 1966. My sister, parents and myself spent our weekends at the ranch maintaining the property, building fences and other dwellings, taking care of livestock, fishing, picnicking and riding horses. My children have also grown up spending their weekends there as I did as a child. This property is part of a legacy we intend to hand down for generations. It has always been my plan to retire there and build a retirement home for me and my wife as my parents did. We had planned on constructing our home near the central piece of our property located between County Road 3300 and County Road 3220. The location of the home would have beautiful long-range views of the area due to its location on the ridge. Although the application does not identify any habitable structures on my property, there in fact are 3 homes located on the property. My parents lived in the southernmost home located in the middle of the property.

1 This home is surrounded by several large oak and cedar trees and looks over two lakes that  
2 are fed by Binion Creek. They have also planted a few tropical trees several years ago.  
3 North of my parents' home is a second house built in 1975 that we recently renovated and  
4 use as a guest home. This is where we spend our time amounting to half of a month. Also  
5 sharing it with others in the ministry. Finally, there is a third home we recently renovated  
6 that is located adjacent to the ranch within the Binion Creek Estates subdivision. Both of  
7 these homes are surrounded by lush vegetation. We have long-time and meaningful  
8 connections with our neighbors and have built a thriving community. Placement of an  
9 electric transmission line through our property and this community would be detrimental  
10 to beauty of our property and its tranquility, as I will testify to below."

## 11 II. PURPOSE OF TESTIMONY

12 Q. What is the purpose of your testimony?

13 A. "The purpose of my testimony is to: (i) describe the property; (ii) describe the expected  
14 impact of the proposed transmission line on the property; (iii) voice my opposition against  
15 certain links and routes; and (iv) provide information on the route that I prefer."

## 16 III. DESCRIPTION OF THE PROPERTY AND IMPACT 17 OF THE TRANSMISSION LINE ON THE PROPERTY

18  
19 Q. Please describe your property.

20 A. "I own tracts along Link 1N and 1O which total approximately 224 acres. The property is  
21 used for recreational, raising cattle on grazing pastures and residential purposes. It consists  
22 of: i) 3 homes; ii) large oak groves and cedar trees and improved pastures; iii) extensive  
23 water features as habitat for various species, including two lakes and four water wells; iv)  
24 a running water creek along Binion Creek, the major tributary in the area, which flows into

1 the Lampasas River; v) several residences on and adjacent to the property; vi) historical  
2 dwelling and vii beautiful views from every part of the property.”

3 **Q. Please describe the Property’s current uses and operations.**

4 A. “Currently the property is used for raising cattle, recreational and recreational purposes,  
5 including hunting and the historical husbandry practices that make this area stand out as a  
6 gem that deserves protection, not development of a large electric transmission line.”

7 **Q. Are there any habitable structures or other improvements on your property?**

8 A. “As stated, there are three habitable structures on my property. Furthermore, there are  
9 several habitable structures in the subdivision adjacent to the property that would also be  
10 affected by the placement of the transmission line on the ridge or on the south boundary  
11 line of the property.”

12 **Q. Please describe your Property’s terrain, it’s ecological features.**

13 A. “The property is defined by the high ridge just west of Binion Creek. The ridge is one of  
14 the highest points in the area, with views extending for miles. Binion Creek runs through  
15 the property, which is the source for two lakes in the center of the property and the lifeblood  
16 of not just my property, but the entire area. The creek and its tributaries provide not only  
17 water, but habitat and protection for ecological treasures that are fast diminishing.”

18 **Q. What ecological concerns do you have with the use of Links 1N or 1O or those Links  
19 which feed into them?**

20 A. “The property is heavily wooded, has good grassland and water features that are rare when  
21 compared to the rest of the study area. The two lakes that are located on my property and  
22 are within a stone’s throw of where the transmission line would be placed. It would have a  
23 very large negative effect on wildlife in the area and the grazing cattle. While areas such

1 as these draw the attention of people looking to live closer to nature, it is important we  
2 maintain the integrity of the land and preserve what we can. Cutting down trees, affecting  
3 waterways and driving out wildlife affects and negatively harms our ecosystem. There are  
4 less burdensome routes. Our plan is to build one retirement home and enjoy the serenity of  
5 the property.”

6 **Q. Why are you specifically opposed to Link 1N?**

7 A. “Link 1N cuts off the southern entrance to our property and my parents’ home. The link  
8 would divide our property in half. Furthermore, it crosses Binion Creek (a tributary to  
9 Lampasas River) and dissects an undisturbed area full of beautiful grassland, trees and  
10 lakes. Although the study shows the transmission line is not within 300 feet of any  
11 CURRENT habitable structure on the property, it is within a 100 feet of the building site  
12 of our retirement home with an existing water well that is operating and slated to service  
13 the new residence. The affect in dissecting this area has a huge effect on the homes in the  
14 area, including my parents’ home. This area serves as a serene area between two  
15 developments and a sanctum for wildlife and cattle. While the study indicates Link 1N  
16 crosses very little bottomland/riparian woodlands, the effect is substantial on this particular  
17 area. Although there may be pressure to develop the area in the future, it is the intention  
18 to maintain this area and protect the trees, lakes and wildlife.”

19 **Q. Why are you specifically opposed to Link 1O?**

20 A. “Due to the narrow shape of this portion of the property, Link 1O affects its entirety. It is  
21 in the foreground of the ridge located west of Binion Creek Estates and another area of  
22 beautifully undisturbed nature. Although the study shows the transmission line to be more  
23 than 300 feet away from any habitable structure, in reality it has a more detrimental effect.

1 This Link would substantially magnify the effect of the transmission line as it would be  
2 seen for miles and obstruct the view of all the houses located in the quadrant of Links 1O,  
3 1N, 1V and 1P. It would make it impossible to build a home without being directly next to  
4 the transmission line. Inevitably using Link 1O would increase the chances of using 1P,  
5 which would then cut off access to our future home. It would be significantly more  
6 detrimental then placing the transmission line in areas without such a ridge. It would be a  
7 shame to burden that many homeowners by spoiling their view."

#### 8 IV. CONCLUSIONS AND RECOMMENDATIONS

9 **Q. Please summarize your position in this proceeding regarding BRAZOS ELECTRIC**  
10 **POWER COOPERATIVE, INC.'s proposed alternative routes.**

11 **A.** "I am strongly against the use of any routes which include Links 1N, 1O, 1P or any links  
12 that feed into those routes using those links. The routes that use those links are more  
13 expensive, longer and damaging then the other alternative routes. I am in favor of the  
14 placement of the transmission line along Route 1 as proposed by the Applicant. Route 1 is  
15 the shortest at only 8.58 miles, and appears to be the 4<sup>th</sup> least expensive alternative route.  
16 Route 1 only has 14 habitable structures and even more importantly has the least impact  
17 on environmental integrity and one of the least impactful routes on cultural resources and  
18 historic value."

19 **Q. Do you have any further statements regarding why you do not support placement of**  
20 **the transmission line in the area of your Property?**

21 **A.** "Yes. The effect of the transmission line will have on my property and homes, as well as  
22 the surrounding homes and wildlife is extremely detrimental in terms of ecological damage,

1 value and use of the property. I am strongly opposed to any route including Links 1N, 1O,  
2 and 1P or any links that feed into Link 1N, 1O, and 1P.”

3 **Q. Does this conclude your testimony?**

4 **A.** “Yes, this concludes my testimony, subject to subsequent correction.”

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