



TEXAS LAND & MINERAL OWNERS ASSOCIATION

BOARD OF DIRECTORS

Chairman
E.O. "Trey" Scott, III
Trinity Mineral Management

Vice-Chairman
Lorin Runnels
ELA Properties, Ltd.

Treasurer
Thomas H. "Tom" Daniel
Six Mountain Partners, LP

John D. Alexander, Jr.
King Ranch

James C. Broussard
J.E. Broussard Heirs O&G, LP
& LaBelle Properties Ltd.

Kimberley K. McTee
Catharine C. Whittenburg Trusts
Turkey Track Ranch

Carolyn Frost Keenan
Keenan Family Interests

Barry Coates Roberts
Coates Energy Trust

R. Neal Wilkins
East Foundation

DISTRICT REPRESENTATIVES

Clay C. Cash
Triple C Properties LLC

Leslie el-Effendi
Catharine C. Whittenburg Trusts
Turkey Track Ranch

Hillary Moore
MDJ Minerals, LP/Connell-
Cowden Minerals, LP

Christina Sasser
Mesteña, LLC/Jones Ranch

Jamey Steen
Buckhorn Resources

Amy Stieren
The Stieren Ranch

Leo Welder
JF Welder Heirs LTD

HONORARY DIRECTORS

The Honorable Dolph Briscoe*
Jack Hunt
Roger Welder
J.A. Whittenburg, III*
The Honorable Cullen Looney
Doug Beveridge
Chaunce Thompson, Jr.*
Morgan Dunn O'Connor
Scott Petty, Jr.
Lica Pinkston
George Tanner*
James P. "Rick" Walker, Sr.*
Dr. John S. Baen, Ph.D*

ADVISORY DIRECTORS

Joseph B.C. Fitzsimons
John B. McFarland
Howard P. Newton
George J. Person
Kitty-Sue Schlink, PhD

EXECUTIVE DIRECTOR

Jennifer Owen

Chairman King and Members of the Committee,

On behalf of our members, thank you for the opportunity to submit these written comments on the proposed 765-kV transmission lines. TLMA is a statewide advocacy organization representing over 600 land, mineral, and royalty owners across Texas. TLMA supports grid resiliency and security. However, recent proceedings surrounding the 765kV lines have exposed threats to the private property rights of Texans. We urge the Committee to consider meaningful reforms that protect those rights.

Landowners deserve a fair process, yet the current framework falls short. Utilities routinely spend months, sometimes years, studying routes, engineering constraints, and environmental factors before filing a Certificate of Convenience and Necessity (CCN) and triggering the statutory clock. Even with open houses and pre-CCN outreach, landowners have far less time to prepare for informal and formal proceedings. From the start, landowners are behind, disadvantaging the very people whose land and livelihoods are at stake.

Because preliminary route segments can be removed and new ones added following the informal notice process, additional landowners may not learn they've been included in a route until the CCN is filed and statutory timelines have already started. Landowners should receive direct, formal notice before a CCN is filed, not after, and not through passive inclusion in a study area spanning thousands of property owners. Real notice gives landowners a genuine chance to prepare, rather than scrambling once a filing is underway. During previous hearings, PUC Chairman Gleeson mentioned proposing additional time after notice is given. TLMA applauds this idea but believes it does not go far enough.

Contesting a proposed route, informally or formally, requires landowners to evaluate the same technical, environmental, legal, and economic factors the utility studies, regardless of whether they can afford professional help or must represent themselves. Qualified experts without conflicts of interest are scarce, and retaining them takes time landowners often do not have under existing deadlines.

We recognize statutory timelines serve an important purpose in providing clarity and predictability. However, it is often the unwritten expectations layered on top of those deadlines that place landowners at a further disadvantage relative to utilities with dedicated staff. Once an individual files as an intervenor, they spend significant time monitoring the docket and responding to other intervenors.

1005 Congress Avenue, Suite 360 • Austin, Texas 78701
(512) 479-5000 • www.tlma.org

Landowners bear full responsibility for defending their land against a utility that has had far more time and resources to determine its preferred route. We don't expect others to do the work for us; we just want a fair opportunity to participate. The PUC's decisions have a permanent impact on the land Texans are stewarding.

We appreciate the Committee's consideration of this important issue for Texas landowners.