## ATTACHMENT 3

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Counsel for V.O.L.T.

## **BEFORE THE UTAH FACILITY REVIEW BOARD**

In the Matter of the Application of Rocky Mountain Power for Petition for Review Docket No. 20-035-03

## DECLARATION OF BENGT JONSSON SUPPORTING V.O.L.T.'S MOTION TO INTERVENE

I, Bengt Jonsson, hereby declare as follows:

1. I have personal knowledge of all the facts set forth herein and would competently testify to the same if called upon to do so in a court of law.

2. I own two properties located at 945 and 955 Stringtown Road, which is along the Midway portion of the transmission line that is the subject of Rocky Mountain Power's ("**RMP**") Petition herein.

3. I am the president and managing director of Valley-Wide Opposition to Large Transmission Lines ("V.O.L.T." or "Petitioner").

4. V.O.L.T. was formed as a nonprofit corporation in 2018 by residents and property owners in Heber Valley who are impacted by RMP's transmission line, including me.

5. V.O.L.T.'s membership includes more than fifty property owners in Midway City whose property is within the corridor of the RMP line, including me.

6. RMP has neither requested nor obtained easements for its proposed expansion of facilities affecting my property, and none of the other 49 property owners have indicated that RMP has contacted them.

7. I have reviewed RMP's estimated overhead or underground construction costs, and I note that they do not include costs of obtaining necessary easements from private property owners, including from me.

8. V.O.L.T. property owner members, including me, have committed to conveying RMP necessary easements to accommodate underground transmission line construction and installation at no cost to RMP, which is a savings that RMP has yet to acknowledge.

9. V.O.L.T. engaged an expert to determine the impact of RMP's proposed overhead construction on property values and the costs of necessary easements for overhead transmission line construction.

10. Based on certified appraisals of more than eighty properties along the overhead transmission line route, V.O.L.T. estimates that costs of obtaining rights of way and expanded easements for overhead construction will cost RMP more than Three and a half million dollars in severance and other damages.

11. RMP, however, puts overhead easement costs at between \$22,595 and \$25,743.

12. One V.O.L.T. member has confirmed that they have already suffered a \$150,000 dollar loss on the sale of their property within the corridor. In that instance both buyer and seller confirmed that lower selling price reflected lost property value by reason of RMP's proposed overhead transmission.

- 2-

I declare under criminal penalty under the laws of the State of Utah that the foregoing is true and correct.

DATED this <u>24</u> day of March, 2020.

RMM

Bengt Jonsson