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## SOAH DOCKET NO. 473-13-5207 PUC DOCKET NO. 41606

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JOINT APPLICATION OF ELECTRIC TRANSMISSION TEXAS, LLC AND SHARYLAND UTILITIES, L.P. TO AMEND THEIR CERTIFICATES OF CONVENIENCE AND NECESSITY FOR THE PROPOSED NORTH EDINBURG TO LOMA ALTA DOUBLE-CIRCUIT 345 KV TRANSMISSION LINE IN HIDALGO AND CAMERON COUNTIES, TEXAS

# BEFORE THE STATE OFFICE

OF

### **ADMINISTRATIVE HEARINGS**

# DIRECT TESTIMONY of GUILLERMO RAMIREZ

#### on behalf of

#### HIDALGO INDEPENDENT SCHOOL DISTRICT

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1		I. INTRODUCTION			
2	Q.	Please state your name, title and address.			
3	А.	My name is Guillermo Ramirez. I am the Director of Support Services for the			
4	Hidalgo Inde	ependent School District in the Hidalgo, Texas area in Hidalgo County, Texas			
5	("District").	My business address is 324 E. Flora St., Hidalgo, TX 78557.			
6	Q.	Have you ever participated or testified in another proceeding before the Public			
7	Utility Commission of Texas ("PUC")?				
8	А.	No.			
9	Q.	On whose behalf are you testifying?			
10	А.	I am testifying on behalf of District and on behalf of the students who attend schools			
11	located on property owned by the District.				
12	Q.	Please describe the District's interest in SOAH Docket No. 41606			
13	А.	The District is an intervener in this proceeding. The District owns property in			
14	Hidalgo Cou	nty, Texas (the "Affected Property") that might be impacted by the transmission line			
15	that Electric T	ransmission Texas ("ETT") and Sharyland Utilities propose to build.			
16	Q.	Are you familiar with the Affected Property?			
17	А.	Yes.			
18					
19		II. PURPOSE OF TESTIMONY			
20	Q.	What is the purpose of your testimony?			
21	А.	The purpose of my testimony is to: (i) describe the Affected Property; (ii) describe			
22	the expected impact of the proposed transmission line; (iii) and voice the District's opposition against				
23	certain links a	nd routes.			
24	Q.	Is the information contained in your testimony true and correct to the best of			
25	your knowledge and belief?				
26	А.	Yes, it is.			
27					
28		<b>III. DESCRIPTION OF THE PROPERTY AND IMPACT OF THE</b>			
29		TRANSMISSION LINE ON THE AFFECTED PROPERTY			
30	Q.	Please describe the District and its purpose.			

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A. The District is a public independent school district located in the Hidalgo/Pharr, 1 Texas area that is dedicated to the highest standards of quality in order to educate all students to 2 3 become lifelong learners and productive citizens. To ensure this outcome, the District commits to a comprehensive system of support for every student. The District, parents, students and community 4 are committed to providing a rigorous curriculum and a culturally diverse learning environment that 5 empowers our graduates to be college and workforce ready in order to meaningfully and successfully 6 participate in a global society. The District includes four elementary schools, one early college 7 8 school, one junior high, one alternative high school and one high school. The District is committed to the education of the students and offers advance placement programs, counseling for higher 9 10 education, after school activities, and other school related programs.

11

Q.

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# Please describe the Affected Property.

A. At least two of the District's campuses are affected by a link proposed by ETT and
Sharyland Utilities, specifically the J.C. Kelly Elementary School located at 201 E Las Milpas Rd.,
Pharr, TX 78577, and the Hidalgo Park Elementary School located at Hidalgo Park Elementary,
8700 South "I" Road, Pharr, TX 78577.

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# Q. What link or links would affect the District's property?

A. The Affected Property will be impacted by the transmission line ETT and Sharyland
Utilities propose to build if any route is approved by the PUC that contains Link 121.

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# Does Link 121 cross the District's property?

A. It is not clear from the maps filed by ETT and Sharyland Utilities, but at a minimum,
it appears that Link 121 will pass within 1000 feet of the two elementary schools within the Affected
Property.

Q. Please describe the Property's current and planned uses and operations and
how those uses and operations would be affected by the construction of a transmission line.

A. As stated above, the District operates two primary school campuses on the Affected
Property.

- 27 Q. Approximately how many students attend schools located on the Property?
- 28 A. Approximately 900 students attend the campuses located on the Property.

Q. Please describe any habitable structures and other improvements on the
 Property and how they would be affected by the construction of a transmission line.

A. The campuses operated by the District on the Affected Property comprise large
 school buildings, including classrooms, auditorium/cafeterias, gymnasiums, and outdoor practice
 fields.

4 Q. Do any existing transmission or distribution lines encumber the Affected 5 Property?

A. No, other than electric distribution lines that provide electricity to the buildings on the7 Property.

8 Q. How would the Property's current and planned uses and operations be affected
9 by the construction of a transmission line using Link 121?

A. As stated above, the District is concerned that such a transmission line, so close to multiple primary school campuses, will adversely affect the health and safety of its students who attend those campuses and the staff who work there. Additionally, the lines will impact the District's intended future and current use of the Affected Property, including the District's ability to utilize the undeveloped property it owns just south of Hidalgo Park Elementary School, where Link 121 runs, for future development, including future schools or facilities.

16 Q. What other concerns does the District have concerning the construction of a 17 transmission line?

A. In addition to its concern for its students, teachers and other staff who attend school
and work on campuses and facilities located on the Affected Property, the District is concerned for
the safety and welfare of residents of communities that the District serves. Many of these residents
live near District campuses and thus also will be affected by Link 121.

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# IV. CONCLUSIONS AND RECOMMENDATIONS

Q. Please summarize your position in this proceeding regarding ETT's and
Sharyland Utilities' proposed alternative routes for the North Edinburg to Loma Alta
Transmission Line Project.

A. The District is very strongly opposed to Link 121 and the alternative routes that utilize such link, including Routes 2, 7, 9, 10, 12, and 13. The District is opposed to Link 121 as it poses a potential health and safety concern for many of the District's primary school students and staff and would interfere with the District's future use and development of its property, thereby

1	unduly interfering with the District's mission to produce responsible and productive citizens from the				
2	surrounding communities.				
3	Q.	Does this conclude your testimony?			
4	А.	Yes, that concludes my testimony, subject to subsequent correction or rebuttal.			
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# AFFIDAVIT OF GUILLERMO RAMIREZ

# STATE OF TEXAS § COUNTY OF HIDALGO §

BEFORE ME, the undersigned authority, on this day personally appeared the person know by me to be Guillermo Ramirez who, after being duly sworn by me, stated as follows:

1. My name is Guillermo Ramirez. I am over eighteen years of age, am of sound mind and competent to make this affidavit. I have personal knowledge of every statement contained in this affidavit, and every statement contained herein is true and correct and based on my own personal knowledge.

2. I make this affidavit in support of my testimony, set forth above, on behalf of the Hidalgo Independent School District. The foregoing 5 pages to which this affidavit is attached, are made a part hereof for all purposes, constitute my direct testimony, which has been prepared in written form for SOAH Docket No. 473-13-5207, Docket No. 41606.

3. I hereby swear or affirm that my answers contained in such direct testimony are true and correct.

Guillermo Ramirez

SUBSCRIBED AND SWORN to before me this \_\_\_\_\_\_ day of November 2013, to certify which witness my hand and seal of office.

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# **CERTIFICATE OF SERVICE**

I certify that a copy of this document has been filed with the Public Utility Commission of Texas. Pursuant to SOAH Order No. 5, on November 8, 2013, a copy of the foregoing document has was served by first class United States mail on the following person:

Jose C. Rodriguez 25337 Pennsylvania Ave. San Benito, Texas, 78586

Pursuant to SOAH Order No. 4, this document will not be served on any other party.

Scott D. McDonald