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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 NORTH EDINBURG TO LOMA §
ALTA DOUBLE-CIRCUIT 345-KV §
TRANSMISSION LINE IN HIDALGO §
AND CAMERON COUNTIES §

BEFORE THE STATE OFFICE

OF

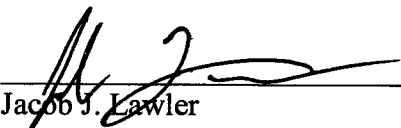
ADMINISTRATIVE HEARINGS

COMMISSION STAFF'S REPLY BRIEF

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Dated: January 8, 2014

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COMMISSION STAFF'S REPLY BRIEF

COMES NOW the Staff (Staff) of the Public Utility Commission of Texas (PUC or Commission), representing the public interest, and files this Reply Brief, and would show the following:

I. INTRODUCTION AND SUMMARY

In total, 16 initial briefs were filed by more than 130 parties. These 16 initial briefs focused on three routes: Route 32, Route 3S Modified (Agreed Route), and Route 1S.

Joint Applicants recommended approval of Route 32 in their initial brief.¹ However, they also stated that they would not oppose approval of Route 3S Modified (Agreed Route) given the advantages of a largely agreed-upon route.²

Most of the landowner intervenors who filed an initial brief are members of the Agreed Parties and thus supported approval of Route 3S Modified (Agreed Route). However, many of the Agreed Parties also filed initial briefs outlining their individual concerns with specific links or routes. Among the Agreed Parties who filed individual initial briefs, all but two – *i.e.*, EIA/Dougherty/Verde Parties and John Randall, Jr. – would likely not oppose Route 1S because that route does not use links to which they are opposed.

A discussion of each initial brief is included in Section IV (Route Selection) below.

¹ Joint Applicants' Initial Brief at Bates 4.

² *Id.* at Bates 4, 27.

II. PROCEDURAL HISTORY, JURISDICTION, AND NOTICE

No reply.

III. ISSUES RELATING TO THE APPLICATION

No reply.

IV. ROUTE SELECTION

Every party who filed an initial brief in this proceeding expressed a preference concerning the route selected. Accordingly, each party's preference is discussed below. However, multiple parties expressed a similar concern regarding the use of Link 287 by Route 1S. Therefore, Staff will discuss Link 287 before addressing the parties' routing preferences.

Link 287 is approximately two miles in length running almost due east in Cameron County, Texas.³ In the initial briefs of the Agreed Parties, EIA/Dougherty/Verde Parties, and John Randall, Jr., Link 287 was criticized for crossing through the Lower Rio Grande National Wildlife Refuge (Wildlife Refuge).⁴ As these parties stated in their briefs, the Wildlife Refuge is federal land that would require approval from the United States Department of the Interior Fish and Wildlife Service (U.S. Fish and Wildlife) to cross. However, Staff does not believe that this requirement precludes the selection of Route 1S.

In arguing against crossing the Wildlife Refuge, the intervenors cite P.U.C. Docket Nos. 32871, 37616, and 38230.⁵ The first two CCN dockets listed are cases where Brazos Electric Power Cooperative, Inc. (Brazos) received Commission approval for a route that required crossing land owned by the U.S. Army Corps of Engineers. Ultimately, Brazos had to re-file its CCN application after failing to receive the needed approval. CCN Docket No. 38230 was a CREZ application by Lone Star Transmission, LLC (Lone Star) where Staff recommended a

³ Joint Applicants Ex. 20 (map).

⁴ Agreed Parties' Initial Brief at Bates 18-20, 27; Initial Post-hearing Brief of EIA/Dougherty/Verde Parties at 28; Initial Brief of John Randall, Jr. at 1, 3-4.

⁵ Initial Brief of John Randall, Jr. at 5-6; Agreed Parties' Initial Brief at 20, 27.

route that crossed U.S. Army Corps of Engineers' (Army Corps') land after the utility received approval to cross from the Army Corps.⁶

The above-referenced CCN dockets are easily distinguishable from the current proceeding. The most significant difference between the cited dockets and this proceeding is the federal agency involved. As the cited dockets aptly demonstrate, the Army Corps has rigorous requirements for utilities that wish to cross its land. U.S. Fish and Wildlife, however, has very different standards as evidenced by the testimony of ETT witness Rob Reid.⁷ Indeed, if the Joint Applicants did not believe that they would receive approval for Link 287 from U.S. Fish and Wildlife, they would not have proposed six routes that use Link 287.⁸ Joint Applicants' witness Rob Reid testified at the hearing on the merits: "Well, any time you cross government property, it can be problematic, and we have had extensive coordination and consultation with the U.S. Fish and Wildlife Services evidenced by the emails and letters in the Environmental Assessment document."⁹ Considering the extent of these communications occurring before filing the application, it is counterintuitive to assert that Joint Applicants would propose six routes using a non-viable link, one of which was a supplemental route filed as a result of the route adequacy hearing.

A. Joint Applicants' Initial Brief

Joint Applicants recommended Route 32 in their initial brief.¹⁰ This recommendation was based on three factors in particular.¹¹ First, Joint Applicants believe that Route 32 is the best long-term transmission planning solution to relieve congestion around South McAllen.¹² Second, Route 32 impacts the fewest number of habitable structures.¹³ Third, Joint Applicants

⁶ Another route was ultimately selected.

⁷ Tr. at 147-153 and 183-184

⁸ Routes that use Link 287 are Routes 3, 9, 14, 18, 29, and 1S.

⁹ Tr. at 184:3-7.

¹⁰ Joint Applicants' Initial Brief at Bates 4.

¹¹ *Id.* at Bates 12-14.

¹² *Id.* at Bates 12.

¹³ *Id.* at Bates 13.

claim that Route 32 is comparable in cost to Route 3S Modified (Agreed Route) and Route 1S after considering the potential cost-savings for future transmission projects.¹⁴

While Staff agrees with Joint Applicants that Route 32 would impact the fewest number of habitable structures, this is the only significant benefit associated with Route 32. Moreover, significant disadvantages weight against Route 32, such as its cost and length.

Staff disagrees that Route 32 is the best solution for the long-term transmission needs around South McAllen. As the hearing on route adequacy and SOAH Order No. 6 demonstrated, there is insufficient evidence to find that ERCOT's directive to route a transmission line "in proximity to" the South McAllen Substation requires routing through the Joint Applicants' proximity circle.¹⁵ Accordingly, Route 32's relative proximity to the South McAllen Substation is not a specific benefit.

Staff also disagrees that Route 32 is comparable in cost to Route 1S after considering the alleged potential cost-savings for future transmission projects. Assuming *arguendo* that the estimated \$51.68 million additional future cost associated with a less-proximate supplemental route (e.g., Agreed Route or 1S) is accurate, Route 1S is still approximately \$15 million less expensive than Route 32. Moreover, this estimated additional cost has been doubted by other parties.¹⁶

Section III.D.11 (Use of Existing Compatible Right-or-Way and Apparent Property Lines) of Joint Applicants' Initial Brief stated: "The combined length of ROW paralleling existing transmission and other existing ROW, apparent property lines, and other natural or cultural features for Route 1S is 68%."¹⁷ Staff believes that the stated percentage is a typographical error and should read 78%. In case this is a factual dispute, however, Staff includes a detailed table below demonstrating that the correct calculation of paralleling ROW for Route 1S is 78.6%, which may be rounded to 79%.

¹⁴ *Id.* at Bates 13-14.

¹⁵ *See* Agreed Parties' Initial Brief at 31, 39-41.

¹⁶ *See Id.* at 37-39.

¹⁷ Joint Applicants Initial Brief at Bates 28.

	Route 32¹⁸		Agreed Route¹⁹		Route 1S²⁰	
Total length (miles)	117.5		96.1		86.3	
ROW using transmission lines	0	0.0%	0	0.0%	0	0.0%
ROW parallel to transmission lines	24.8	21.1%	26.6	27.7%	16.3	18.9%
ROW parallel to other ROW	44	37.4%	34.8	36.2%	39	45.2%
ROW parallel to property lines	18.3	15.6%	16.2	16.9%	12.5	14.5%
Total	87.1 miles	74.1%	77.6 miles	80.7%	67.8 miles	78.6%

Finally, Joint Applicants acknowledged the challenges of routing this transmission project, and stated that they would not oppose approval of Route 3S Modified (Agreed Route) given the advantages of a largely agreed-upon route.²¹

B. Agreed Parties' Initial Brief

The largest group of aligned parties, the "Agreed Parties," recommended Route 3S Modified (Agreed Route) and opposed the selection of any other route.²² To support this recommendation, the Agreed Parties argued that Route 3S Modified (Agreed Route):

(1) best represents the community values in the study area as the route is the result of numerous impacted landowners agreeing to have the transmission line placed on their property;

(2) is shorter in length and less expensive than any of the 32 original routes (Routes 1 through 32), and is allegedly comparable in length and expense to the 10 supplemental routes (Routes 1S through 10S);

(3) impacts fewer habitable structures than 28 other routes;

¹⁸ EA at Table 4-1.

¹⁹ Joint Applicants Ex. 22.

²⁰ Amended Application at Table 4-1S.

²¹ Joint Applicants' Initial Brief at Bates 4, 27.

²² Agreed Parties' Initial Brief at 8.

(4) has the least harmful impacts on land use when agricultural, residential, and commercial (future) development uses are considered;

(5) parallels existing transmission line infrastructure for a significant portion of its total length;

(6) parallels existing easements or property boundaries for approximately 81% of its total length; and

(7) is acceptable to Texas Parks and Wildlife Department from an environmental perspective.²³

The Agreed Parties oppose Route 1S for two primary reasons. First, Route 1S would cross the Wildlife Refuge, which would require federal approval.²⁴ Second, Route 1S is not supported by landowner intervenors.²⁵ The first reason was repeated by other parties and is discussed above. Also, a significant number of intervenor landowners do not appear to oppose selection of Route 1S, based on the concerns listed in their initial briefs.²⁶

C. D'Hemecourt Properties, Inc.'s Initial Brief

D'Hemecourt Properties, Inc. (D'Hemecourt Properties) owns land that would be directly affected by Links 194, 195, and 196b.²⁷ Moreover, D'Hemecourt Properties opposed any route that would use Link 196b (*e.g.*, Route 32).²⁸ In the event the Commission approves Route 32, D'Hemecourt Properties requested that Route 32 be modified to use Links 351a, 351b, 193c, 194, 201, 207, 208, and 209 rather than Links 196b, 200, and 203.²⁹

D'Hemecourt Properties compared Link 196b (on Route 32) to Links 193c and 194 (on the Agreed Route and Route 1S) using the factors set forth in PURA § 37.056(c) and P.U.C.

²³ *Id.* at 9.

²⁴ *Id.* at 18-20, 27.

²⁵ *Id.* at 22-23, 27-28.

²⁶ *See Supra.* at Section I (Introduction and Summary).

²⁷ D'Hemecourt Properties, Inc.'s Initial Brief on the Merits at 2.

²⁸ *Id.* at 3.

²⁹ *Id.*

SUBST. R. 25.101(b)(3)(B).³⁰ Based upon this review, D'Hemecourt Properties concluded that using Links 193c and 194 is superior to using Link 196b because the former links are shorter, affect fewer habitable structures, and pose less threat to potential development and property values.³¹

Staff notes that D'Hemecourt Properties would likely not object to Route 1S as this route does not use Link 196b.

D'Hemecourt Properties is a member of the Agreed Parties and incorporated the Agreed Parties' Initial Brief by reference.³²

D. EIA/Dougherty/Verde's Initial Brief

EIA/Dougherty/Verde Parties own land that would be directly affected by any of the 42 proposed routes.³³ However, EIA/Dougherty/Verde Parties specifically oppose the use of Links 41a, 41b, 42, 48, 50, 51, 54, 70, 99, 100, 135, 136b, and 137a.³⁴ Although EIA/Stag would prefer not to have the transmission line on its property, it has agreed to use Links 136a and 355 with the conditions set forth in the Joint Stipulation filed on December 2, 2013.³⁵

EIA/Stag opposed Route 1S because Links 135 and 137a (on Route 1S) would require a transmission structure in the southeast corner, thereby preventing the development of an entrance to the property in that location and limiting access from U.S. Highway 281.³⁶ Additionally, EIA/Dougherty/Verde Parties argued that Route 1S should not be selected because it would require federal approval to cross the Wildlife Refuge, and it is opposed by affected landowners, including EIA/Stag.³⁷

³⁰ *Id.* at 4.

³¹ *Id.*

³² *Id.* at 3.

³³ Initial Post-hearing Brief of EIA/Dougherty/Verde Parties at 2.

³⁴ *Id.* at 3.

³⁵ *Id.*

³⁶ Initial Post-hearing Brief of EIA/Dougherty/Verde Parties at 5.

³⁷ *Id.* at 12.

EIA/Dougherty/Verde Parties are members of the Agreed Parties and incorporated the Agreed Parties' Initial Brief by reference.³⁸

E. Hidalgo County Regional Mobility Authority's Initial Brief

Hidalgo County Regional Mobility Authority stated that its interest is to ensure that its road projects and the Joint Applicants' transmission line project are planned and constructed as efficiently as possible.³⁹ Accordingly, Hidalgo County Regional Mobility Authority does not oppose the transmission line along and/or overlapping its right-of-way (ROW), nor does it oppose the transmission line crossing one of its roadways.⁴⁰

Although Hidalgo County Regional Mobility Authority identified a conflict with Link 169 prior to the hearing on the merits, this conflict was resolved through negotiations with Joint Applicants.⁴¹ Moreover, Hidalgo County Regional Mobility Authority compared Links 169 and 166, and found that Link 169 better satisfies the policy of prudent avoidance and is consistent with community values, as evidenced by the support of numerous intervenors and Staff for routes that use Link 169.⁴²

Staff notes that Hidalgo County Regional Mobility Authority would likely not object to Route 1S as this route could use Link 169 in a manner consistent with the negotiated agreement.

Hidalgo County Regional Mobility Authority is a member of the Agreed Parties and incorporated the Agreed Parties' Initial Brief by reference.⁴³

F. John Scaief Farms, John Scaief, Michael Scaief, Vista HC, Ltd., Vista MC, LLC, and Resaca Del Monte, Ltd.'s Initial Brief

John Scaief Farms, John Scaief, Michael Scaief, Vista HC, Ltd., and Vista MC, LLC opposed the use of Link 270 (on Route 32) because this link would cross directly through the center of their property and over residential areas.⁴⁴

³⁸ *Id.* at 3.

³⁹ Hidalgo County Regional Mobility Authority's Initial Brief at 2.

⁴⁰ *Id.*

⁴¹ *Id.* at 3.

⁴² *Id.* at 6.

⁴³ *Id.* at 3-4, 6-8.

Staff notes that John Scaief Farms, John Scaief, Michael Scaief, Vista HC, Ltd., and Vista MC, LLC would likely not object to Route 1S as this route does not use Link 270.

John Scaief Farms, John Scaief, Michael Scaief, Vista HC, Ltd., Vista MC, LLC, and Resaca Del Monte, Ltd. are members of the Agreed Parties.

G. City of McAllen's Initial Brief

The City of McAllen opposed the use of Link 118a (on Route 32) because of its proximity to the McAllen-Miller International Airport and the attendant engineering and cost constraints.⁴⁵

Although the City of McAllen supported the selection of Route 3S Modified (Agreed Route), it would likely not object to Route 1S as this route does not use Link 118a.⁴⁶

The City of McAllen is a member of the Agreed Parties.⁴⁷

H. Mil Encinos Property Ltd. and G. E. Bell Properties Ltd.'s Initial Brief

Mil Encinos Property Ltd. and G. E. Bell Properties Ltd. (jointly, Mil Encinos) opposed the use of Links 56, 60, and 344 (on Route 32) because these links would adversely impact long-standing community objectives for the Bell Tract, according to Mil Encinos.⁴⁸ Additionally, Mil Encinos argued that use of Links 56, 60, and 344 (on Route 32) would eliminate over 130 multi-family residential structures on the Bell Tract and would jeopardize the ability to generate sufficient ad valorem tax revenues needed to repay debts incurred to provide the infrastructure for the Bell Tract.⁴⁹

Staff notes that Mil Encinos would likely not object to Route 1S as this route does not use Links 56, 60, and 344.

⁴⁴ John Scaief Farms, John Scaief, Michael Scaief, Vista HC, Ltd., Vista MC, LLC, and Resaca Del Monte, Ltd.'s Initial Brief at 2.

⁴⁵ City of McAllen's Initial Post-hearing Brief at 1-2, 4-14.

⁴⁶ *Id.* at 14.

⁴⁷ *Id.*

⁴⁸ Post-hearing Brief of Mil Encinos Property Ltd. and G. E. Bell Properties Ltd. at 4.

⁴⁹ *Id.* at 7.

Mil Encinos is a member of the Agreed Parties.⁵⁰

I. Progreso Co-op Gin, Inc.'s Initial Brief

Progreso Co-op Gin, Inc. opposed the use of Link 196b (on Route 32) because that link allegedly would cut across gin property and directly over gin structures, interfering with gin operations and would cause undue hardship on the local cotton farmers.⁵¹

Staff notes that Progreso Co-op Gin, Inc. would likely not object to Route 1S as this route does not use Link 196b.

Progreso Co-op Gin, Inc. is a member of the Agreed Parties.

J. John Randall, Jr.'s Initial Brief

John Randall, Jr. opposed the use of Link 287 (on Route 1S) because that link allegedly would bisect Mr. Randall's property and create a new corridor across the Wildlife Refuge.⁵² Additionally, the approval necessary for Link 287 to cross the Wildlife Refuge as currently proposed would not be granted by U.S. Fish and Wildlife, according to Mr. Randall.⁵³ In the alternative, Mr. Randall asked that if Route 1S is selected, Link 287 be replaced with Links 289 and 291A consistent with U.S. Fish and Wildlife's request.⁵⁴ Based upon Staff's review of Mr. Randall and U.S. Fish and Wildlife's request, Links 287 and 294 could be replaced by Links 288, 289, and 291. As shown on Attachment A, this substitution would result in the transmission line affecting 11 additional habitable structures, a reduction of .43 miles through UFSFW Wildlife Refuge, and an increase in overall length of 0.38 miles.⁵⁵ Estimated costs associated with this substitution are not available at this time but with only a slight increase in length and habitable structures, Staff anticipates any increase in cost would not be significant. Although Mr. Randall is also a member of the Agreed Parties, Staff supports his suggestion of modifying Route 1S to

⁵⁰ *Id.* at 1.

⁵¹ Progreso Co-op Gin, Inc.'s Initial Brief at 2-3.

⁵² Initial Brief of John Randall, Jr. at 1.

⁵³ *Id.* at 1, 3-4.

⁵⁴ *Id.* at 10.

⁵⁵ Links 287 and 294 are routed within 500 feet of 8 habitable structures and have an overall length of 3.51 miles. Links 288, 289, and 291 are routed within 500 feet of 19 habitable structures and have an overall length of 3.89 miles. See EA at Figure 5-1, City of San Juan Ex. 4.

replace Link 287 as above discussed. It would also allow for collocating the line without need for a new right of way.

K. Jose C. Rodriguez's Initial Brief

Jose C. Rodriguez opposed the use of Links 278 and 279 (on Agreed Route). Mr. Rodriguez "did not agree to the 'Agreed Route', and will never do so."⁵⁶ According to Mr. Rodriguez, Links 278 and 279 would diminish the local aesthetics and property value, as well as productivity of his ranch and planned real estate developments.⁵⁷

Staff notes that Mr. Rodriguez would likely not object to Route 1S as this route does not use Links 278 and 279.

L. City of San Juan's Initial Brief

The City of San Juan opposed the use of Links 166 and 149 because these links would: (1) impact a significant number of habitable structures; (2) be located within close proximity to three local schools; (3) negatively affect local recreational and park areas; and (4) diminish significant commercial and residential development initiatives in San Juan.⁵⁸

Staff notes that the City of San Juan would likely not object to Route 1S as this route does not use Links 166 and 149.

The City of San Juan is a member of the Agreed Parties.⁵⁹

M. Texas Parks and Wildlife Department's Initial Brief

Texas Parks and Wildlife Department (TPWD) opposed the use of Links 70, 71a, 71b, 72, 73, 74, 75, 77, 76, 77, 78, 79, 80, 81, 82, 83, 84a, 84b, and 359 because of those links' proximity to several managed tracts owned either by TPWD or U.S. Fish and Wildlife and the associated adverse impacts to the wildlife and wildlife habitat.⁶⁰ TPWD also stated that it does

⁵⁶ Brief of Jose C. Rodriguez at 1.

⁵⁷ *Id.* at 2-3.

⁵⁸ Initial Brief of the City of San Juan, Texas at 4.

⁵⁹ *Id.* at 9.

⁶⁰ Texas Parks and Wildlife Department's Initial Brief at 3.

not oppose Route 3S Modified (Agreed Route) provided that Links 273, 308, 321, 322, 327, 328, 335, 340, and 341 be marked with bird flight diverters in accordance with applicable standards.⁶¹ Additionally, TPWD requested that its recommendations provided to the Commission on September 13, 2013, and in TPWD witness Russell Hooten's direct and live testimony be incorporated into the final order.⁶²

Staff notes that TPWD has recommended Route 1S as the best route compared to Route 32 and Route 3S Modified (Agreed Route).⁶³

N. United Irrigation District and Hidalgo County Irrigation District No. 16's Initial Brief

United Irrigation District and Hidalgo County Irrigation District No. 16 opposed Route 32 and Routes 10 through 18 because these routes allegedly would adversely affect the safe and reliable irrigation district operations.⁶⁴

Staff notes that United Irrigation District and Hidalgo County Irrigation District No. 16 would likely not object to Route 1S as this route is not one of the western routes identified by these parties as likely to cause adverse effects.

United Irrigation District and Hidalgo County Irrigation District No. 16 are members of the Agreed Parties.⁶⁵

O. Olga Villarreal's Initial Brief

Olga Villarreal opposed Link 269 (on Route 32) because that link would negatively impact her property.⁶⁶ Ms. Villarreal does not oppose Route 1S as this route would not affect her property.⁶⁷

⁶¹ *Id.*

⁶² *Id.*

⁶³ Commission Staff's Initial Brief at 12.

⁶⁴ Initial Brief of United Irrigation District and Hidalgo County Irrigation District No. 16 at 1.

⁶⁵ *Id.* at 5.

⁶⁶ Olga Villarreal's Initial Brief at 1-2.

⁶⁷ *Id.* at 1.

Ms. Villarreal is a member of the Agreed Parties.⁶⁸

V. TEXAS PARKS AND WILDLIFE DEPARTMENT RECOMMENDATIONS

No reply.

VI. CONCLUSION

In its initial brief, Staff recommended Route 1S.⁶⁹ This route is the shortest and least expensive route among those recommended by a party. Moreover, Route 1S impacts 240 fewer habitable structures than Route 3S Modified (Agreed Route). Additionally, Route 1S is approximately \$69 million less expensive than Route 32.

Staff's recommended route of 1S has numerous advantages over all the alternative routes including Routes 32 and 3S Modified (Agreed Route) and best meets all the PURA and Commission rule criteria while equitably balancing cost, length, and habitable structures. With that said, Route 3S Modified (Agreed Route) is not an entirely objectionable route. Staff's main concerns with that route are the additional 240 habitable structures affected and the approximately \$25.7 million increased cost. These factors are so significant that Route 3S Modified (Agreed Route) is not a route that Staff can support. As discussed in Section J, Staff also supports a modified Route 1S that replaces Links 287 and 294 with Links 288, 289, and 291, which would result in an increase in length of .38 miles and only affect an additional 11 habitable structures.

⁶⁸ *Id.* at 2.

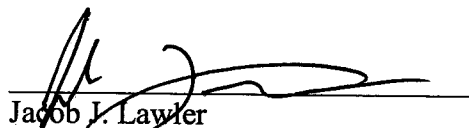
⁶⁹ Commission Staff's Initial Brief at 4.

Dated: January 8, 2013

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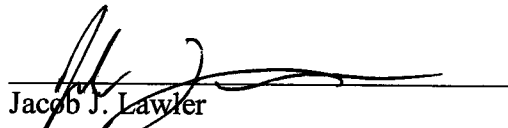


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CERTIFICATE OF SERVICE

I certify that a copy of this document will be served on all applicable parties of record in accordance with SOAH Order No. 4 on January 8, 2014.



Jacob J. Lawler

STAFF'S IS REVISED

Evaluation Criteria		287	294	Total	288	289	291	Total	Difference
Land Use		2.46	1.05	3.51	0.61	0.87	2.41	3.89	0.38
Length of alternative route		5	3	8	0	1	18	19	11
Number of habitable structures ¹ within 500 feet of ROW centerline		3	3	6	0	1	10	11	5
Number of newly affected habitable structures ¹ within 500 feet of ROW centerline		0	0	0	0	0	0	0	0
Number of habitable structures ¹ likely to be relocated/removed ²		0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
Length of ROW using existing transmission line ROW		0.00	0.00	0.00	0.61	0.00	0.92	1.53	1.53
Length of ROW parallel to existing transmission line ROW		0.62	0.00	0.62	0.00	0.87	0.40	1.27	0.66
Length of ROW parallel to other existing ROW (highways, pipelines, railways, canals, etc.)		0.07	0.00	0.07	0.00	0.00	0.14	0.14	0.07
Length of ROW parallel to apparent property lines ³		0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
Length of ROW through parks/recreational areas ⁴		0	0	0	0	0	0	0	0
Number of parks/recreational areas ⁴ crossed by ROW centerline		0	0	0	0	0	0	0	0
Number of additional parks/recreational areas ⁴ within 1,000 feet of ROW centerline		1.19	0.00	1.19	0.00	0.00	0.76	0.76	-0.43
Length of ROW through USFWS National Wildlife Refuges		0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
Length of ROW through IBWC managed ROW		1.78	1.04	2.82	0.00	0.69	0.55	1.24	-1.58
Length of ROW through cropland ⁵		0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
Length of ROW through orchards		0.27	0.00	0.27	0.61	0.12	1.29	2.02	1.75
Length of ROW through pasture/rangeland		0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
Length of ROW through land irrigated by travelling systems (rolling or pivot type)		0	0	0	0	0	0	0	0
Number of pipeline crossings		2	0	2	0	1	1	2	0
Number of transmission line crossings		0	0	0	0	0	0	0	0
Number of US and State highway crossings		1	0	1	0	0	1	1	0
Number of farm-to-market road crossings		0	0	0	0	0	0	0	0
Number of cemeteries within 1,000 feet of the ROW centerline		0	0	0	0	0	0	0	0
Number of FAA registered airports with at least one runway more than 3,200 feet in length located within 20,000 feet of ROW centerline		0	0	0	0	0	0	0	0
Number of FAA registered airports having no runway more than 3,200 feet in length located within 10,000 feet of ROW centerline		0	0	0	0	0	0	0	0
Number of private airstrips within 10,000 feet of the ROW centerline		0	0	0	0	0	0	0	0
Number of heliports within 5,000 feet of the ROW centerline		0	0	0	0	0	0	0	0
Number of commercial AM radio transmitters within 10,000 feet of the ROW centerline		0	0	0	0	0	0	0	0
Number of FM radio transmitters, microwave towers, and other electronic installations within 2,000 feet of ROW centerline		0	0	0	0	0	0	0	0
Aesthetics		0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
Estimated length of ROW within foreground visual zone ⁶ of US and State highways		1.17	0.00	1.17	0.00	0.37	1.38	1.75	0.58
Estimated length of ROW within foreground visual zone ⁶ of farm-to-market roads		0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
Estimated length of ROW within foreground visual zone ⁶ of parks/recreational areas ⁷		0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
Ecology		0.12	0.00	0.12	0.00	0.00	0.29	0.29	0.17
Length of ROW through upland woodlands		0.18	0.00	0.18	0.00	0.00	0.16	0.16	-0.02
Length of ROW through bottomland/riparian woodlands		0.04	0.00	0.04	0.00	0.00	0.09	0.09	0.05
Length of ROW across mapped NWI wetlands		0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
Length of ROW across known habitat of federally listed endangered or threatened species		0.04	0.00	0.04	0.00	0.00	0.09	0.09	0.05
Length of ROW across open water (lakes, ponds)		0	0	0	0	0	2	2	2
Number of stream crossings		0	0	0	0	0	0	0	0
Number of river crossings		7	1	8	0	2	3	5	-3
Number of irrigation/drainage canal crossings		0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
Length of ROW parallel (within 100 feet) to streams or rivers		0.05	0.00	0.05	0.00	0.00	0.08	0.08	0.03
Length of ROW across 100-year floodplains		0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
Length of ROW within Coastal Management Program boundary		0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
Length of ROW seaward of the Coastal Facilities Designation Line		0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
Cultural Resources		0	0	0	0	0	0	0	0
Number of recorded cultural resource sites crossed by ROW		0	0	0	0	0	0	0	0
Number of additional recorded cultural resource sites within 1,000 feet of ROW centerline		0	0	0	0	0	0	0	0
Number of National Register listed sites crossed by ROW centerline		0	0	0	0	0	0	0	0
Number of additional National Register listed sites within 1,000 feet of ROW centerline		0	0	0	0	0	0	0	0
Length of ROW across areas of high archeological site potential		1.74	0.61	2.35	0.11	0.12	2.06	2.29	-0.06

Notes:

¹Single-family and multi-family dwellings, mobile homes, apartment buildings, commercial structures, industrial structures, business structures, churches, hospitals, nursing homes, and schools, or other structures normally inhabited by humans or intended to be inhabited by humans on a daily or regular basis within 500 feet of the centerline of a transmission project of 230-kV or more.

²ETT will potentially relocate/remove habitable structures within 75ft of the centerline. Sharyland will potentially relocate/remove habitable structures within 50ft of the centerline.

³Property lines created by existing roads, highways, or railroad ROWs are not "double-counted" in the length of ROW parallel to property lines criteria.

⁴Defined as parks and recreational areas owned by a governmental body or an organized group, club, or church within 1,000 feet of the centerline of the project. This includes the Chihuahua Woods Preserve.

⁵Cropland does not include orchards.

⁶One-half mile, unobstructed.