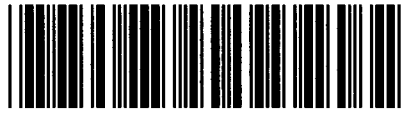




Control Number: 41606



Item Number: 915

Addendum StartPage: 0

**PUC DOCKET NO. 41606**

RECEIVED  
2013 SEP -3 AM 10:54  
PUBLIC UTILITY COMMISSION  
FILING CLERK

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 PUBLIC  
UTILITY COMMISSION OF TEXAS

**VALLE DE LOS TESOROS, LTD.'S STATEMENT OF POSITION**

Pursuant to Public Utility Commission Procedural Rule 22.124, Intervenor Valle de los Tesoros, Ltd. files this, its Statement of Position, and would show the Public Utility Commission (the "Commission") as follows:

**I.  
POSITION**

Valle de los Tesoros, Ltd. ("VDLT") is a Texas limited partnership. VDLT owns an approximately 196.193 acre tract located at the Northwest corner of 10th Street and Dicker Road in Hidalgo, Texas (the "Property"). The Property bears tax identification numbers 189961, 189973, 190002. The Property consists of raw land, three (3) warehouse facilities and three (3) single family dwellings. The Property is directly affected by one or more routes proposed by Joint Applicants Electric Transmission Texas, LLC and Sharyland Utilities, L.P.

**II.  
QUESTIONS OF FACT, LAW OR POLICY**

The question of fact, law or policy presented is whether the proposed routes would unduly burden and/or impact the Property, including its commercial value?

### **III. STATEMENT OF POSITION**

VDLT's position in this proceeding is that the proposed routes 108 and 109 would directly and unduly burden and impact the Property.

First, proposed routes 108 and 109 would effectively split the Property in half running along the length of the Property. This would include splitting the existing warehouses and the single family residences on the Property. Further, there is already an electric transmission line immediately adjacent to proposed routes 108 and 109 and Applicants should be required to locate their links along that existing transmission line and not be given additional property to locate their links. Granting Applicants the additional space for their links, given the existing transmission line already in place, would unduly burden the Property, VDLT and its tenants, and would cause unnecessary duplication of electric transmission lines. Instead, Applicants should locate their links along the existing transmission line and work within the boundaries of such line for all operations and maintenance.

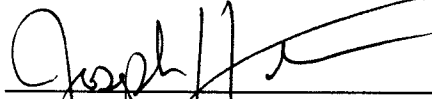
Second, the Property is currently subject to a regulated racing license issued by the Texas Racing Commission. As a licensed area, the Property is subject to the rules and restrictions of the Texas Racing Commission. VDLT's development plans for the Property, and the construction of a racetrack and related grounds on the Property, would be severely impaired by proposed routes 108 and 109. Specifically, the location of audience facilities, animal facilities and protection and the overall operation of the racetrack would be unduly impacted and could make it impossible for VDLT to operate on the Property and remain in compliance with the Texas Racing Commission guidelines.

As a result of the foregoing, proposed routes 108 and 109 would severely affect both commercial and residential tenants, severely impact the commercial value of the Property, its

capital improvements and cause significant diminished value for the remainder of Property not directly impacted by proposed routes 108 and 109.

Respectfully Submitted,

ATLAS, HALL & RODRIGUEZ, LLP



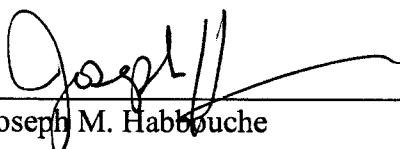
---

Joseph M. Habbouche  
State Bar No.: 24055610  
P.O. Box 3725  
McAllen, Texas 78501

Attorneys for Intervenor  
Valle de los Tesoros, Ltd.

**CERTIFICATE OF SERVICE**

I, Joseph M. Habbouche, attorney for Valle de los Tesoros, Ltd., certify that a copy of this document was served on all parties of record in this proceeding on August 30, 2013 in the following manner: via first class mail.

  
\_\_\_\_\_  
Joseph M. Habbouche