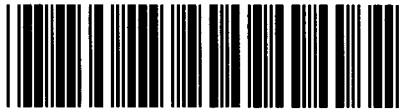


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SOAH DOCKET NO. 473-13-5207
PUC DOCKET NO. 41606

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

**PROGRESO COOP GIN, INC., AND HIDALGO COUNTY
IRRIGATION DISTRICT NO. 5'S STATEMENT OF POSITION**

The Progreso Coop Gin, Inc., and Hidalgo County Irrigation District No. 5 ("PCG" and "HCID 5") file this Statement of Position pursuant to Public Utility Commission ("PUC" or "Commission") Procedural Rule 22.124. In this proceeding, PCG and HCID 5's position on route adequacy of Electric Transmission Texas, LLC's and Sharyland Utilities, L.P.'s ("ETT/Sharyland" or "Joint Applicants") application to amend their certificates of convenience and necessity ("CCN") is as follows:

I. ROUTE ADEQUACY

Joint Applicants have not presented an adequate number of reasonably differentiated routes in certain respects within their application. The Commission requires that a CCN application contain an adequate number of reasonably differentiated routes that allows a reasoned choice of route considering all the facts and circumstances presented. Joint Applicants failed to present an adequate number of reasonably differentiated routes to allow the Commission a reasoned choice of routes. All of the 32 filed routes pass through one of two links in the Progreso area. Link 196b and link 193c are the only two options for passing the Progreso area. The Joint Applicants have constrained the choice of the Commission by offering the

Commission only two link choices. Accordingly, the routes are not "reasonably differentiated" in the manner in which they move past the Progreso area.

Joint Applicant's limited link options directly affect PCG and HCID 5. Link 196b potentially constrains the cotton gin's operations and would cause disruption and difficulty for all the cotton farmers in the Progreso area who depend on the PCG. Potential spillover from the effects on PCG could affect the operations of HCID 5, if movement of the link infringed on their property immediately adjacent to PCG's property.

Joint Applicants' application in this proceeding does not contain an adequate number of routes and does not present sufficiently differentiated routes so that the Commission has any meaningful choices in this proceeding. PCG and HCID 5 further join other route adequacy objectors. Therefore, the Honorable Administrative Law Judges in this proceeding should direct Joint Applicants to restudy the area and to amend their application to contain an adequate number of reasonably differentiated routes.

WHEREFORE, PREMISES CONSIDERED, PCG and HCID 5 respectfully pray that the Honorable Administrative Law Judges find Joint Applicants' application lacks an adequate number of reasonably differentiated routes and further requests any and all other relief to which it is justly entitled.

Respectfully submitted,

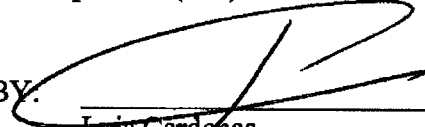
ESCOBEDO, TIPPIT & CARDENAS, LLP

3900 N. 10th Street, Suite 950

McAllen, TX 78501

Telephone: (956) 618-3357

Telecopier: (956) 618-3361

BY: 


Luis Cardenas

State Bar No. 24001837

ATTORNEYS FOR CITY OF PROGRESO COOP
GIN, INC., AND HIDALGO COUNTY
IRRIGATION DISTRICT NO. 5

CERTIFICATE OF SERVICE

I hereby certify that on this 17th day of September, 2013, a true and correct copy of the foregoing document was served in accordance with SOAH Order No. 4.


LUIS CARDENAS