



Control Number: 41606



Item Number: 977

Addendum StartPage: 0

RECEIVED

SOAH DOCKET NO. 473-13-5201 SEP 20 PM 12:59  
(PUC DOCKET NO. 41606)

PUBLIC UTILITY COMMISSION  
FILING CLERK

**JOINT APPLICATION OF** ♦ **BEFORE THE STATE OFFICE**  
**ELECTRIC TRANSMISSION OF** ♦  
**TEXAS, LLC and SHARYLAND** ♦  
**UTILITIES 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**

**CITY OF PHARR, ET AL.'S  
RULE 22.201 MOTION TO TRANSFER VENUE**

**MAY IT PLEASE THE PRESIDING JUDGES:**

The CITY OF PHARR, PHARR ECONOMIC DEVELOPMENT CORPORATION, INC., II, and PHARR TAX INCREMENT REINVESTMENT ZONE (also known as "Joint Intervenor"), pursuant to Public Utility Commission rules, ask that the venue for evidentiary hearings be reconsidered and in support show the following.

1.

**AUTHORITY**

Texas Public Utility Commission (PUC) Rule, Section 22.201 states the following:

**All evidentiary hearings shall be held in Austin, unless the commission determines that it is in the public interest to hold a hearing elsewhere. The commission may, when it is in the public interest, hold regional hearings to obtain public comment.**

2.

### **LINE LOCATIONS**

As stated in the Joint Application (Item 2 of the PUC online document interchange, page 16) "**12,000 landowners**" who owned property located within 500 feet of the preliminary alternative routing links were mailed notices of public meetings and open houses. The number of those affected since the filing of the initial joint application has grown as a result of the widespread knowledge of public officials, public administrators, joint landowners, heirs, and other affected entities.

3.

### **CLASS SIZE**

As stated during the August 30, 2013 hearing in Austin, Texas, there are more than five hundred (500) intervenors in this case. All those affected have land in either the counties of Hidalgo or Cameron. The turnout of the affected landowners on August 30, 2013 in Austin was little to none when compared to those affected.

4.

### **PUBLIC INTEREST**

As the proposed route locations will affect only lands and territories within the counties of Hidalgo and Cameron, it is in the public interest to hold any evidentiary hearings in the Rio Grande Valley. The demographics of the landowners and affected persons in the counties of Hidalgo and Cameron generally are of low income or small business that would be prejudiced should testimony be required in Austin. Requiring landowners to attend only in Austin would affect families that would be unable to afford

travel, affect employment schedules and requested time off, and affect continued business operations of small to moderate businesses.

5.

### **EFFICIENCY AND ECONOMY**

The state and hearings' personnel are in a better position to accommodate travel to the Rio Grande Valley as the personnel necessary to conduct the hearings is limited and the census is not as voluminous. State officers and related personnel will be lesser impacted than affected landowners should venue be transferred.

6.

### **PUBLIC FACILITIES**

After consultation with other intervenors, as well as public personnel and representatives, local authorities would be willing to accommodate state and other personnel with public facilities and buildings to conduct the necessary hearings. This will lessen any prospective burdens of the state in selecting suitable locations. Thus, the joint intervenors asks that the Commission determine that it is in public interest to allow evidentiary hearings to be conducted in the Rio Grande Valley.

Respectfully submitted,

THE PRUNEDA LAW FIRM, P.L.L.C.

P.O. Box 1664

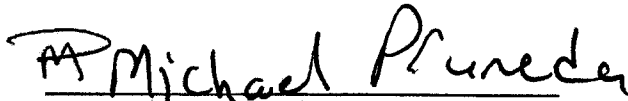
Pharr, Texas 78577

(956) 702-9675

(956) 702-9675 Fax

Web: michaelpruneda.com

Email: michael@michaelpruneda.com

By:   
MICHAEL PRUNEDA  
State bar No. 24025601

ATTORNEY FOR CITY OF PHARR,  
PHARR ECONOMIC DEVELOPMENT  
CORPORATION, INC., II, and PHARR  
TAX INCREMENT REINVESTMENT  
ZONE

**JOINT INTERVENORS**