



Control Number: 44837



Item Number: 276

Addendum StartPage: 0

RECEIVED

2016 JAN 22 AM 9:10

APPLICATION OF AEP TEXAS
CENTRAL COMPANY TO AMEND ITS
CERTIFICATE OF CONVENIENCE
AND NECESSITY FOR THE TULETA
TO EULER TO COLETO CREEK
DOUBLE-CIRCUIT 138-KV
TRANSMISSION LINE IN BEE AND
GOLIAD COUNTIES, TEXAS

§
§
§
§
§
§
§
§

BEFORE THE STATE OFFICE
PUBLIC UTILITY COMMISSION
FILING CLERK
OF
ADMINISTRATIVE HEARINGS

STATEMENT OF POSITION

OF

Adair Ramsey Sutherland

AND

REQUEST FOR RECONSIDERATION AND REINSTATEMENT

1 I, Adair Ramsey Sutherland, request that the ALJ's reconsider their decision to dismiss
2 me as an intervenor. I believe that it was a mistake to dismiss me because the consequences of
3 my failure to file direct testimony or a statement of position was not made clear to me, nor was
4 the process to file a statement of position in lieu of the costly process of preparing and filing
5 direct testimony and of being subject to cross-examination and other related matters.
6 Accordingly, I request that I be reinstated as an intervenor.

7

8 If my request to be reinstated is granted, I offer the following statement of position:

9 I am opposed to any route for the proposed transmission line that contains Link CC, as identified
10 in the AEP Application, and therefore, Routes EC-4, EC-5, EC-15 and EC-17. My opposition is
11 based on:

12 (i) the existence of cemeteries in the vicinity of Link CC;

- 1 (ii) the likely disturbance and destruction of areas of historical significance in the San Antonio
2 River and Cabeza Creek beds and banks and contributing areas, including, without
3 limitation, the United States Department of Interior's San Antonio River Valley (West of
4 Goliad) Rural Historical District;
- 5 (iii) the likely adverse environmental implications of the crossings of the San Antonio River and
6 Cabeza Creek beds and drainage areas;
- 7 (iv) the detrimental effects on the recreational areas associated with the San Antonio River and
8 Cabeza Creek;
- 9 (v) the existence of a National Historical Trail, El Camino Real de los Tejas, in the vicinity of
10 Link CC;
- 11 (vi) Link CC is not in conformance with community values; e.g., the Goliad Commissioners
12 Court opposes Link CC, as does the local Farm Bureau and Historical Commission;
- 13 (vii) Link CC is not compatible with the existing electric right-of-way to which Link CC runs
14 parallel because the existing right-of-way is for an old 69kV line on wooden poles, and the
15 proposed double-circuit 138kV metal pole line is much larger, taller, visible, intrusive and
16 uglier than the existing line; and
- 17 (viii) the dangers associated with a natural gas pipeline that runs very close to Link CC for
18 some distance and actually crosses Link CC.

Respectfully submitted,

Adair R. Sutherland

Adair R. Sutherland

(Printed Name)

1/20/16

(Date)

CERTIFICATE OF SERVICE

I certify that on the 21 day of January 2016 a true and correct copy of the foregoing instrument was served on all parties of record in accordance with the provisions of SOAH Order No. 2 in the subject proceeding.

Adair R. Sutherland
(signature)

Adair R. Sutherland
(Printed Name)