



Control Number: 45624



Item Number: 95

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## Request to Intervene in PUC Docket No. 45624

The following information must be submitted by the person requesting to intervene in this proceeding. This completed form will be provided to all parties in this docket. **If you DO NOT want to be an intervenor, but still want to file comments, please complete the "Comments" page.**

Mail this completed form and 10 copies to:

Public Utility Commission of Texas  
Central Records  
Attn: Filing Clerk  
1701 N. Congress Ave.  
P.O. Box 13326  
Austin, TX 78711-3326

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First Name: STEPHEN Last Name: HULL  
Phone Number: 361-500-2405 Fax Number: 361-653-3011  
Address, City, State: 4525 MOONLAKE RIDGE DRIVE  
CORPUS CHRISTI, TX 78413

I am requesting to intervene in this proceeding. As an INTERVENOR, I understand the following:

- ☐ I am a party to the case;
- ☐ I am required to respond to all discovery requests from other parties in the case;
- ☐ If I file testimony, I may be cross-examined in the hearing;
- ☐ If I file any documents in the case, I will have to provide a copy of that document to every other party in the case; and
- ☐ I acknowledge that I am bound by the Procedural Rules of the Public Utility Commission of Texas (PUC) and the State Office of Administrative Hearings (SOAH).

Please check one of the following:

- ☐ I own property with a habitable structure located near one or more of the utility's proposed routes for a transmission line.
- ☐ One or more of the utility's proposed routes would cross my property.
- ☒ Other. Please describe and provide comments. You may attach a separate page, if necessary. \_\_\_\_\_

SEPARATE PAGE INCLUDED.

Signature of person requesting intervention:

Steph Hull

Date: 3/21/2016

## Request to Intervene in PUC Docket # 45624

Public Utility Commission of Texas

Central Records

Attn: Filing Clerk

1701 N. Congress Avenue

Austin, TX 78711-3326

I am an owner of forty acres of land in Panola County, which is considered "directly affected land" in this docket. The property is located on the proposed Route Segment 6, which is included in five Route Designations, identified as RP 28, 41, 46, 50, and 53, of the double circuit, 345 kV transmission line proposed by The City of Garland dba Garland Power & Light. I desire to file as an Intervenor in PUC Docket # 45624, due to the following five reasons:

1. The centerline of the proposed Route Segment 6 crosses a habitable structure on our land, which was constructed within the past year or so.
2. The proposed Route Segment 6 crosses the waterline which transports water from our water well to the various habitable structures on our property, as well as to the fruit orchard and one or more of the vegetable gardens and berry patches. If this proposed easement were to be granted, it would effectively separate the habitable structures from their sole water source, which is the well. It would also effectively separate the orchard, gardens, and berry patches from their sole source of irrigation. It is important to note that the cultivation method we plan to utilize requires a lot of water, more than the average rainfall for Panola County, making irrigation necessary.
3. The proposed Route Segment 6 bisects my land. This will make it unusable for the purpose for which we originally acquired the land, which was to plant and operate a farm for the cultivation of vegetables and fruit with a "USDA organic" designation. We planted more than 100 organic fruit trees within the past two years in an orchard we cleared for that purpose, which the proposed Route Segment 6 crosses. Although still small, some of these trees have already borne fruit. In addition, we have harvested berries from the berry patches several times. We have also been raising several colonies of honey-bees on one of the corners of the orchard for roughly the past two years. The bees have now produced approximately 150 pounds of honey which is ready to be harvested.
4. Due to the fact that the proposed Route Segment 6 bisects our land, that the centerline crosses a habitable structure on the property, and that the easement would cross the only waterline on the property, the granting of such an easement would significantly diminish the value of the property. As mentioned, the granting of the proposed easement would render the land unusable for the purpose for which we initially intended when we purchased it, so we would have to sell it and buy other land. However, the sale price would be far less than what we have invested in the property with a 345 kV transmission line bisecting the property, running directly over one of the habitable structures, and the easement separating all the habitable structures from their sole water source.
5. The proposed Route Segment 6 encompasses several known active nests of Bald Eagle mating pairs. The granting of this easement, as well as the subsequent installation of the structures and power lines with their associated on-going maintenance, might disrupt the activities of this protected species or interfere with their reproductive capacity.

First Name: Stephen

Last Name: Hull

Address: 4525 Moonlake Ridge Drive

City, State, Zip: Corpus Christi, Texas, 78413

Phone: 361-500-2405

Fax: 361-653-3011

Signature of person requesting intervention: Steph Hull

Date: 3/24/2016