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SOAH DOCKET NO. 473-16-4342

PUC DOCKET NO. 45866

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PUBLIC UTILITY COMMISSION  
STATE OF TEXAS

APPLICATION OF LCRA	§	BEFORE THE STATE OFFICE
TRANSMISSION SERVICES	§	
CORPORATIONS TO AMEND A	§	
CERTIFICATE OF	§	
CONVENIENCE AND NECESSITY	§	OF
FOR THE ROUND ROCK-	§	
LEANDER 138-KV	§	
TRANSMISSION LINE IN	§	
WILLIAMSON COUNTY	§	ADMINISTRATIVE HEARINGS

**DIRECTOR  
SHYJU SASIMOHANAN'S  
STATEMENT OF POSITION**

Director Shyju SasiMohanana (the "Director") files this Statement of Position in response to SOAH Order No. 5.

**I. Background**

On April 28, 2016, LCRA Transmission Services Corporation ("LCRA") filed an application with the Public Utility Commission of Texas (the "PUC") to amend its certificate of convenience and necessity for a 138-kilovolt transmission line in Williamson County, Texas. The application concerns LCRA seeking certification for circuits for two substations and a new 138-kV transmission line for the Leander to Round Rock 138-kV Transmission Line Project (the "Project"). On August 15, 2016 the State Office of Administrative Hearings ("SOAH") filed SOAH Order No. 5 requesting intervenors to file statements of position or written testimony related to the Project by September 12, 2016.

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Director is a member of the Board of Directors (the "Board") of the Sendero Springs at Brushy Creek Homeowners Association, Inc. (the "Association"). The Association, acting through the Board, manages the affairs of Sendero Springs (the "Community"). Each owner of a lot in the Community automatically becomes a member of the Association. On June 8, 2016, Director filed his Request to Intervene in PUC Docet No. 45866 and it was received by the PUC on June 10, 2016.

## **II. Statement of Position**

The Project consists of various proposed routes that are estimated to range from twelve (12) to twenty-one (21) miles in length. Several of the proposed routes for the Project abut the Associations' property. Specifically, links A3 and A3a abut property owned by the Association that is intended for the common use and enjoyment of members of the Community. The Association has approved a proposed plan to construct a children's park on Cascada Lane. Links A3 and A3a would be within one-thousand (1000) feet of the proposed children's park. Additionally, links A3 and A3a abut upwards of eighty (80) residences within the Community.

The impact of links A3 and A3a will likely impair the value of the Community, prohibit the planned recreational parks from being built, and affect the members' habitable structures. Director is not opposed to the Project entirely, but is opposed to the proposed route of the Project as it relates to links A3 and A3a.

### III. Prayer

For these reasons, Director asks the Administrative Law Judges to consider alternate routes that do not abut the Association's property. Director also requests all other relief to which Director is entitled.

Respectfully submitted,



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Shyju Sasi Mohanan