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APPLICATION OF RAYBURN § BEFORE THE STATE OFFICE
COUNTRY ELECTRIC COOPERATIVE §
TO AMEND A CERTIFICATE OF §
CONVENIENCE AND NECESSITY FOR §
THE LOWER BOIS D'ARC WATER § OF
TREATMENT PLANT 138-KV §
TRANSMISSION LINE PROJECT IN §
FANNIN AND HUNT COUNTIES, §
TEXAS § ADMINISTRATIVE HEARINGS

REPLY BRIEF

OF

THE ROUTE MOD L ALLIANCE

TO THE HONORABLE ADMINISTRATIVE LAW JUDGE:

COME NOW Linda Lee Leslie, Hot House Plants Limited Partnership, Hank Mastellar, Mark and Phyllis Morgan, William Roberts, and Ray Jack Roberts (collectively, the "Route Mod L Alliance") to offer this Reply Brief in the Joint Application of Rayburn Country Electric Cooperative ("Rayburn" or Applicant") to Amend its Certificate of Convenience and Necessity ("CCN") for the Lower Bois D'Arc Water Treatment Plant 138-kV Transmission Line in Fannin and Hunt Counties, Texas ("Application" or "Project"). In summary, the only routes recommended and supported by parties in initial briefs are Route Mod L or Route Mod L-23A.

- The Mod L Alliance recommends and supports Route Mod L. Mark and Phyllis Morgan are willing to accept Segment 35 of Route Mod L.
- No party recommends or supports a route that affects the South Intervenors or the Northern Alliance.
- No party recommends or supports a route that affects Bill Hardin, Goodman Family Living Trust, Alan McDonald, or Janee Lindsey Paul.

- The Applicant recommends and supports Route Mod L, but does not oppose Route Mod L-23A.
- Commission Staff recommends and supports Route Mod L.

The chart in Mod L Alliance’s Initial Brief is updated to reflect the Intervenor’s briefing:

INTERVENOR(S)	ROUTE SUPPORTED	LEGAL REPRESENTATION
<u>Route Mod L Alliance:</u> Linda Lee Leslie, Hot House Plants Limited Partnership, Hank Mastellar, Mark and Phyllis Morgan, William Roberts, and Ray Jack Roberts	Route Mod L No Opposition to Route Mod L-23A	Patrick L. Reznik Braun & Gresham, PLLC
<u>The Northern Alliance</u> Paul Gant, Billy R. Gant, Trustee, James Stone III, Robert W. Irish, Jr., Ron Wahlquist, T.W.M. Long III, and Robert Peace	Route Mod L No Opposition to Route Mod L-23A	Tyler Topper Burdett, Morgan, Williamson & Boykin, LLP
<u>South Intervenor</u> Jay Norman, Frances Dyer Hickman, Ben M. Dyer, and Jack Norman	Route Mod L No Opposition to Route Mod L-23A	Bradford W. Bayliff Bayliff Law Firm PLLC
Bill Hardin, Goodman Family Living Trust, Alan McDonald, Janee Lindsey Paul	Route Mod L No Opposition to Route Mod L-23A	Reid Barnes Lynn Sherman Law Firm and Consulting
Margaret Fritz	Route Mod L	Pro Se

INTERVENOR(S)	ROUTE SUPPORTED	LEGAL REPRESENTATION
	No Opposition to Route Mod L-23A	
Ronney and Laura Thompson	Route Mod L No Opposition to Route Mod L-23A	Pro Se
Jeremiah Gilliland	No opposition to Route Mod L or Route Mod L-23A	Pro Se
Huan Yang aka Cathy Yang	Route Mod L-23A and Opposes Route Mod L	Pro Se

PRAYER

The Route Mod L Alliance, all but one Intervenor, the Applicant, and Commission Staff support the adoption of Route Mod L based on the foregoing discussion. Specifically, Route Mod L is comparable to, or superior to, the other most commonly supported routes based on the evidence and quantitative criteria provided in the application and is far superior in the qualitative criteria of community values than any other route presented in this proceeding. However, the Applicant and the Intervenor either support or do not oppose Route Mod L-23A.

Respectfully submitted,

BRAUN & GRESHAM, PLLC

P.O. Box 1148 (Mailing)
Dripping Springs, Texas 78620
14101 Hwy. 290 W., Bldg. 1100 (Physical)
Austin, Texas 78737

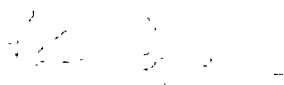
512-894-5426 (telephone)
512-894-3405 (fax)

Patrick L. Reznik
State Bar No. 16806780
Cassie Gresham
State Bar No. 24045980
Shane D. Neldner
State Bar No. 24062435

ATTORNEYS FOR THE ROUTE MOD L ALLIANCE

CERTIFICATE OF SERVICE

I certify that a copy of this document will be served on all parties of record on September 21, 2018, in accordance with SOAH Order No. 2 issued in this docket.



Patrick L. Reznik