JOINT APPLICATION OF
SHARYLAND UTILITIES, LP AND
CITY OF LUBBOCKM ACTING BY
AND THROUGH LUBBOCK POWER &
LIGHT, FOR CERTIFICATE OF
CONVENIENCE AND NECESSITY
FOR THE PROPOSED ABERNATHY
TO WADSWORTH 345-KV
TRANSMISSION LINE IN HALE AND
LUBBOCK COUNTIES, TEXAS

PUBLIC UTILITY COMMISSION

MOTION IN INTERVENTION OF GILBREATH FAMILY, LTD.

COMES NOW Gilbreath Family, Ltd., and pursuant to P.U.C. Proc. Rule 22.103 and
22.104, files this, its Motion to Intervene in the above-captioned docket. In support of this Motion,
Gilbreath Family, Ltd. would show the following:

I.

The address for Gilbreath Family, Ltd. is as follows:

Gilbreath Family, Ltd.
624 27th Street
Lubbock, Texas 79404

II.

The name, address, telephone number and e-mail address of Gilbreath Family, Ltd.’s
authorized representatives is as follows:

BRADY & HAMILTON
Zach Brady
Brent Hamilton
1602 13th Street
Lubbock, Texas 79401
(806) 771-1850 (Office)
(806) 771-3750 (Fax)
zach@bhlawgroup.com
brent@bhlawgroup.com

Gilbreath Family, Ltd. request that the Public Utility Commission of Texas (“the
Commission”) and all parties to this proceeding serve copies of all correspondence, pleadings, briefs, and other documents upon the authorized representatives at the Lubbock address shown above.

III.

Gilbreath Family, Ltd. has standing to intervene in this docket, as that term is defined in P.U.C. Proc. R. 22.103(b)(2), because Gilbreath Family, Ltd. has a justiciable interest that may be adversely affected by the outcome of this docket. Gilbreath Family, Ltd. owns property located in Lubbock County. Gilbreath Family, Ltd. has been notified by Sharyland Utilities, L.P. that its property may be directly affected by the proposed transmission line that is the subject of this docket.

NOW THEREFORE, for the above-mentioned reasons Gilbreath Family, Ltd. respectfully requests that this, its Motion in Intervention in the above-captioned case be granted and request any other relief to which it may show itself entitled.

Respectfully submitted,

BRADY & HAMILTON, LLP

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ATTORNEYS FOR INTERVENOR
GILBREATH FAMILY, LTD.
CERTIFICATE OF SERVICE

I hereby certify that a true and correct copy of the foregoing has been served on all parties of record, via facsimile, or U.S. mail, electronic mail or e-service on this 2nd day of October, 2018.

Zachary Brady