



Control Number: 34611



Item Number: 60

Addendum StartPage: 0

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APPLICATION OF KELSON
TRANSMISSION COMPANY, LLC
FOR THE PROPOSED CEDAR
BAYOU-TO DEWEYVILLE 345 KV
TRANSMISSION LINE WITH
CHAMBERS, HARDEN, JASPER,
JEFFERSON, LIBERTY, NEWTON
AND ORANGE COUNTIES

§ PUBLIC UTILITY COMMISSION
§
§ OF TEXAS

FILING CLERK

SOUTH TEXAS ELECTRIC COOPERATIVE INC.'S
MOTION TO INTERVENE

Comes Now South Texas Electric Cooperative, Inc. ("STEC") and files its Motion to intervene in the above-referenced proceeding. In support thereof, it shows as follows:

1. Kelson Transmission Company (Kelson) has in effect filed for a Certificate of Convenience and Necessity (CCN) to be an electric utility so it can be a transmission provider within ERCOT in its application for a CCN to build a transmission line that would interconnect generation from outside of ERCOT to within ERCOT. It is not currently an electric utility within Texas. Section 37.051 of PURA only requires an electric utility to first seek a CCN from the Commission that states that the service is required before it can directly or indirectly provide service to the public. Parties who are not electric utilities that have sought to interconnect from outside ERCOT to within ERCOT have been required to build the transmission line as a non-utility and have not been able to recoup their costs from ratepayers within ERCOT or have the right of condemnation.

2. STEC owns and operates transmission facilities within ERCOT. Under ERCOT's postage stamp pricing it pays all other transmission providers within ERCOT. It will be directly impacted by the action sought by Kelson. Therefore, it has a justiciable interest that would be adversely affected by the outcome of this proceeding if the relief sought is granted.


3. STEC's authorized representative in this matter is:

Jo Campbell
Attorney-At-Law
PO Box 154415
Waco, Texas 76715
Telephone: 254-799-2978
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STEC requests that all correspondence, pleadings, and all other documents filed be served upon its authorized representative.

For all of the above reasons, STEC requests that its Motion to Intervene be granted.

Respectfully submitted,


Jo Campbell
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(w/permission from Jo Campbell)

CERTIFICATE OF SERVICE

I hereby certify that I have served a copy of the foregoing document upon all parties of record by hand delivery, facsimile and/or first class mail on this 8th day of October 2007.

Jo Campbell
Jo Campbell

(w/permission
from Jo Campbell)