



Control Number: 37448



Item Number: 135

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**SOAH DOCKET NO. 473-10-1097  
PUC DOCKET NO. 37448**

**APPLICATION OF LCRA  
TRANSMISSION SERVICES  
CORPORATION TO AMEND ITS  
CERTIFICATE OF CONVENIENCE  
AND NECESSITY FOR THE  
GILLESPIE TO NEWTON 345-KV  
CREZ TRANSMISSION LINE IN  
GILLESPIE, LLANO, SAN SABA,  
BURNET, AND LAMPASAS  
COUNTIES, TEXAS**

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**BEFORE THE  
STATE OFFICE  
OF  
ADMINISTRATIVE HEARINGS**

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**KREUZ MOTION TO INTERVENE**

Pursuant to the Public Utility Commission of Texas' ("PUC's" or "Commission's") Procedural Rules §§ 22.103 and 22.104, Charles and Patricia Kreuz, the Charles Paton Kreuz Trust, Mrs. Anne Lischen Kerr, and Mr. James Roderick Kreuz (collectively "Kreuz Family"), file this motion to intervene in the above-captioned docket. The intervention deadline established for this proceeding is November 30, 2009; therefore, this motion is timely filed.

The Kreuz Family has property interests that are crossed by or that have a habitable structure within one of the proposed alternative routes in this proceeding. Specifically, the Kreuz Family property is crossed by proposed segment C-4 in LCRA's application. As such, the Kreuz Family are directly affected landowners and should be allowed to intervene in this proceeding.

The principle contact for the Kreuz Family is:

Ms. Patricia Kreuz  
P.O. Box 816  
Fredericksburg, TX 78624

Kreuz's Motion to Intervene  
P.U.C. Docket No. 37448

The Kreuz Family's legal representatives for this proceeding are:

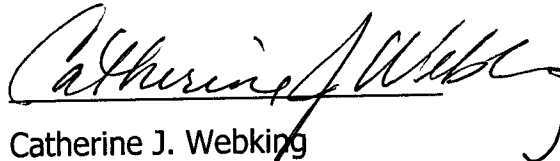
Catherine J. Webking  
The Webking Law Firm  
400 W. 15<sup>th</sup> Street, Suite 720  
Austin, Texas 78701  
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[webking@webkinglaw.com](mailto:webking@webkinglaw.com)

Mary Carter  
Blackburn Carter, P.C.  
4709 Austin St.  
Houston, TX 77004  
713-524-1012 phone  
713-524-5165 fax

The Kreuz Family requests that all pleadings, correspondences, documents, requests for information, and responses to requests for information be served to the above-named authorized representatives.

WHEREFORE, PREMISES CONSIDERED, the Kreuz Family respectfully requests that this motion to intervene in the above-styled docket be granted.

Respectfully submitted,



Catherine J. Webking  
State Bar No. 21050055

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**ATTORNEYS FOR THE KREUZ FAMILY**

**CERTIFICATE OF SERVICE**

I certify that a copy of the above has been sent via electronic mail or via facsimile as designated by all parties of record in this proceeding on this 23<sup>rd</sup> day of November, 2009.

