



Control Number: 37448



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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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PUBLIC UTILITY COMMISSION
FILING CLERK

**MR. BOB KOEHLER'S
MOTION TO INTERVENE**

Pursuant to the Public Utility Commission of Texas' ("PUC's" or "Commission's") Procedural Rules §§ 22.103 and 22.104, Mr. Bob Koehler files this motion to intervene in the above-captioned docket.

I. Standing to Intervene

Mr. Koehler owns property which is traversed by a proposed route in this docket. However, LCRA failed to notify Mr. Koehler about the Gillespie to Newton transmission line and he, therefore, does not appear on LCRA's noticed landowner list. As such, Mr. Koehler has a justiciable interest which may be adversely affected by the outcome of this proceeding.

II. Authorized Representative

Mr. Koehler's legal representative for this proceeding is:

Ms. Shannon K. McClendon
Attorney & Counselor at Law
400 W. 15th Street, Suite 720
Austin, Texas 78701

Mr. Bob Koehler's Motion to Intervene
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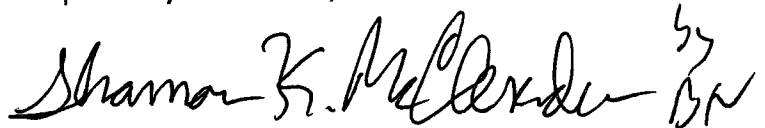
III. Service of Pleadings

Mr. Koehler requests that all pleadings, correspondences, documents, requests for information, and responses to requests for information be served to the above-named authorized representative. When available, Mr. Koehler prefers service by electronic mail.

IV. Conclusion

WHEREFORE, PREMISES CONSIDERED, Mr. Koehler respectfully requests that it be granted intervenor status to participate as a party in this proceeding.

Respectfully submitted,

A handwritten signature in black ink, reading "Shannon K. McClendon" with a stylized "BN" or similar mark to the right.

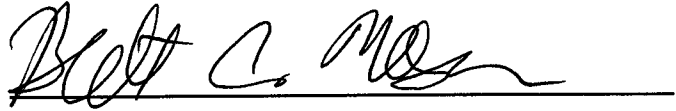
Shannon K. McClendon
State Bar No. 13412500

LAW OFFICES OF SHANNON K. McCLENDON
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ATTORNEY FOR MR. BOB KOEHLER

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 30th day of November, 2009.

A handwritten signature in black ink, appearing to read "Brett C. Nelson", is written over a horizontal line.

Brett C. Nelson