



Control Number: 38140



Item Number: 20

Addendum StartPage: 0

SOAH DOCKET NO. 473-10-4109  
PUC DOCKET NO. 38140

APPLICATION OF ONCOR ELECTRIC  
DELIVERY COMPANY, LLC TO  
AMEND A CERTIFICATE OF  
CONVENIENCE AND NECESSITY  
(CCN) FOR A PROPOSED 345 kV  
TRANSMISSION LINE WITHIN  
ARCHER, CLAY, COOKE, DENTON,  
JACK, MONTAGUE, WICHITA,  
WILBARGER, AND WISE COUNTIES,  
TEXAS (RILEY – KRUM WEST CCN)

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BEFORE THE  
PUBLIC UTILITY COMMISSION  
OF TEXAS

FORSYTHE MOTION TO INTERVENE

Pursuant to P.U.C. PROC. R. 22.103 and 22.104 Richard W. and Sara Barbara Forsythe and the Forsythe Company (collectively, "Forsythe") file this Motion to Intervene in the above proceeding, and in support thereof, would respectfully show the following:

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I.

Forsythe owns property and business interests along or near one or more of the proposed transmission line routes for this application. Accordingly, Forsythe has property rights or interests that may be adversely affected by the outcome of this proceeding and has standing to intervene under P.U.C. PROC. R. 22.103(b)(2).

II.

The telephone number and address of Forsythe's authorized representative is as follows:

Mary K. Sahs  
State Bar No. 17522300  
Carls, McDonald & Dalrymple, LLP  
Barton Oaks Plaza  
Building 2, Suite 500  
901 South MoPac Expressway  
Austin, Texas 78746  
Telephone: (512) 623-5443  
Facsimile: (512) 472-8403  
<mailto:marysahs@cmcdlaw.com>

Forsythe requests that all correspondence, pleadings, briefs, requests for information, response to requests for information, and other documents in this matter be served upon its authorized representative.

III.

WHEREFORE, PREMISES CONSIDERED, Forsythe requests that its Motion to Intervene, and any such other and further relief as it is justly entitled to, be granted.

Respectfully submitted,

CARLS, MCDONALD & DALRYMPLE, LLP  
Barton Oaks Plaza  
Building 2, Suite 500  
901 South MoPac Expressway  
Austin, Texas 78746  
Telephone: (512) 623-5443  
Facsimile: (512) 472-8403  
<mailto:marysahs@cmcdlaw.com>



MARY K. SAHS  
State Bar No. 17522300

ATTORNEYS FOR FORSYTHE

**CERTIFICATE OF SERVICE**

I, Mary K. Sahs, certify that a copy of this document was served on all parties of record in this proceeding on this the 11<sup>th</sup> day of May, 2010 by facsimile or mailed by First Class U.S. Mail.

  
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MARY K. SAHS