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PUBLIC UTILITY COMMISSION
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APPLICATION OF ONCOR ELECTRIC §
DELIVERY COMPANY LLC TO AMEND § PUBLIC UTILITY COMMISSION
A CERTIFICATE OF CONVENIENCE AND §
NECESSITY (CCN) FOR A PROPOSED § OF TEXAS
345-KV TRANSMISSION LINE WITHIN §
ARCHER, CLAY, COOKE, DENTON, §
JACK, MONTAGUE, WICHITA, §
WILBARGER, AND WISE COUNTIES, §
TEXAS

UNITED STATES AIR FORCE'S MOTION TO INTERVENE

Pursuant to Public Utility Commission ("PUC" or "Commission") Procedural Rules 22.103 and 22.104, the United States Air Force, on behalf of Sheppard AFB, Wichita Falls, Texas, files this Motion to Intervene in the above-referenced proceeding, and in support thereof, respectfully shows the following:

I.

The United States Air Force owns Sheppard AFB located in Wichita Fall, Texas, adjacent to proposed routes C4, C21, C22, D1, D2, D3, D4, E1, E2, E3, F1, F2, and F3a. Sheppard AFB is a flight training base with four runways within five miles of the nearest proposed route. The proposed lines will be sited under two classifications of airspace called "Class Delta" and "Alert" airspace. The D, E and F 1, and F2 routes fall under the Class Delta which extends five 5 nautical miles from the base and up to 3000 feet from the airfield. The joint use tower located at Sheppard AFB owns the airspace from the surface to 3000 feet. The other routes listed above are located under the "Alert Airspace." "Alert Airspace" extends 12 nautical miles from the surface to 4000 feet around the perimeter of the base and is designated as an "Alert" area due to the high density student training that takes place in that area. There are approximately 250 daily sorties, including those flown by student pilots, that fly over the proposed routes using both visual and instrument flight rules. Obstructions in the proposed route area would potentially alter military flight operations and pose a safety hazard for pilots during training

missions. Flights routinely fly 500 feet and lower over the D and E routes that link to the F routes. Additionally, the construction of the lines, which will presumably require the use of cranes, will interfere with airspace because they are taller than the proposed poles. Thus, the United States Air Force has a justiciable interest that may be adversely affected by the outcome of this proceeding.

II.

The United States Air Force's authorized representative is as follows:

Major Evelyn R. Nackman
United States Air Force
AFLOA/JACE
112 Luke Ave, Ste 105
Bolling AFB, Washington D.C. 20032
Telephone: (202) 767-1575/1585
Email: evelyn.nackman@pentagon.af.mil

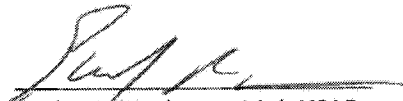
Maj Nackman is a licensed Illinois attorney. Her bar number is #6272243. Maj Nackman has practiced as an United States Air Force attorney for 9 years and is in good standing with her bar and the United States Air Force. She has appeared before the PUC in another matter relating to ONCOR's CREZ Application PUC Docket Number 37409 on behalf of the United States Air Force, Dyess AFB.

III.

The United States Air Force requests that all correspondence, pleadings, briefs, requests for information, responses to requests for information, and other documents in this proceeding be served upon its authorized representative.

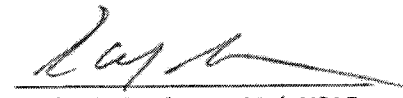
WHEREFORE, PREMISES CONSIDERED, the United States Air Force requests that its Motion to Intervene and any other and further relief to which it is justly entitled be granted.

Respectfully Submitted,


Evelyn R. Nackman, Maj, USAF
Environmental Litigation Attorney

CERTIFICATE OF SERVICE

I, Evelyn R. Nackman, attorney, certify that a copy of this document was sent to all parties of record in this proceeding on this 7th Day of May, 2010, in the following manner: via fax and email.


Evelyn R. Nackman, Maj, USAF
Environmental Litigation Attorney