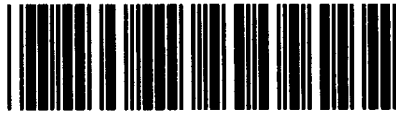


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Item Number: 24

Addendum StartPage: 0

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APPLICATION OF SHARYLAND §
UTILITIES, L.P. TO AMEND ITS §
CERTIFICATE OF CONVENIENCE §
AND NECESSITY FOR THE §
HEREFORD TO WHITE DEER §
345-KV CREZ TRANSMISSION LINE §
(FORMERLY PANHANDLE AB TO §
PANHANDLE BA) IN ARMSTRONG, §
CARSON, DEAF SMITH, OLDHAM, §
POTTER AND RANDALL COUNTIES §

BEFORE THE

STATE OFFICE OF

ADMINISTRATIVE HEARINGS

MOTION TO INTERVENE
OF TULLY CURRIE, DAVID H. CURRIE, II, ROBERT LANE CURRIE,
SUSAN M. ROGERS, DR. HUGH BOB CURRIE, JIM CURRIE, DANIEL L. ROGERS,
CANYON RIDGE CATTLE COMPANY, DBS CURRIE RANCH, A PARTNERSHIP,
AND THE GENEVIEVE CURRIE GREEN REVOCABLE TRUST

Pursuant to Public Utility Commission Procedural Rules 22.103 and 22.104, Tully Currie, David H. Currie, II, Robert Lane Currie, Susan M. Rogers, Dr. Hugh Bob Currie, Jim Currie, Daniel L. Rogers, Canyon Ridge Cattle Company, DBS Currie Ranch, a partnership, and the Genevieve Currie Green Revocable Trust (herein referred to as the "Currie Family Interests"), and file this Motion to Intervene in the above-referenced proceeding, and in support hereof respectfully show the following:

1. Tully Currie owns property located in Sections 40 and 57, Block 6, I&GN RR Co. Survey, Randall County, Texas (Abstract #289 and 306) that will be crossed by one or more of the proposed routes selected by Sharyland Utilities, L.P. ("Sharyland") for the transmission line that it proposes in its application in this proceeding. Accordingly, Mr. Currie may be impacted by decisions made in this proceeding and has a justiciable interest that may be adversely affected by the outcome of this proceeding and on that basis seeks to intervene.

24

The address for Tully Currie is as follows:

Tully Currie
4900 Goehmann Lane
Fredericksburg, Texas 78624-6327

2. David H. Currie, II, Robert Lane Currie, and Susan M. Rogers own undivided interests in property located in Sections 26 and 39, Block 6, I&GN RR Co. Survey, Randall County, Texas (Abstract #274, 275, 287, 288, 397, and 308) that will be crossed by one or more of the proposed routes selected by Sharyland for the transmission line that it proposes in its application in this proceeding. DBS Currie Ranch, a partnership, is composed of these property owners and is the entity through which they transact ranch business. Accordingly, David H. Currie, II, Robert Lane Currie, Susan M. Rogers, and DBS Currie Ranch, a partnership, may be impacted by decisions made in this proceeding and have justiciable interests that may be adversely affected by the outcome of this proceeding and on that basis seek to intervene.

The address for David H. Currie, II is as follows:

David H. Currie, II
1216 South Travis Street
Amarillo, Texas 79102

The address for Robert Lane Currie is as follows:

Robert Lane Currie
4006 Montague
Amarillo, Texas 79109

The address for Susan M. Rogers is as follows:

Susan M. Rogers
6907 Cloud Crest
Amarillo, Texas 79124

The address for DBS Currie Ranch, a partnership, is as follows:

DBS Currie Ranch, a partnership
c/o David H. Currie, II
1216 South Travis Street
Amarillo, Texas 79102

3. Dr. Hugh Bob Currie and Jim Currie own undivided interests in property located in Sections 56, 57, 72, and 73, Block 6, I&GN RR Co. Survey, Randall County, Texas (Abstract #305, 306, 321, and 322) that will be crossed by one or more of the proposed routes selected by Sharyland for the transmission line that it proposes in its application in this proceeding. Accordingly, Dr. Hugh Bob Currie and Jim Currie may be impacted by decisions made in this proceeding and have justiciable interests that may be adversely affected by the outcome of this proceeding and on that basis seek to intervene.

The address for Dr. Hugh Bob Currie is as follows:

Dr. Hugh Bob Currie
4 Medical Drive, Suite C
Amarillo, Texas 79106

The address for Jim Currie is as follows:

Jim Currie
4100 Shelby Drive
Amarillo, Texas 79109

4. Daniel L. Rogers is the spouse of Susan M. Rogers; together they own the Canyon Ridge Cattle Company. Daniel L. Rogers and the Canyon Ridge Cattle Company are lessees of the canyon rim property jointly owned by David H. Currie, II, Robert Lane Currie, and Susan M. Rogers, described above in paragraph 2. The lease interest held by Daniel L. Rogers and Canyon Ridge Cattle Company encompasses cattle operations and hunting activities. The leased property will be crossed by one or more of the proposed routes selected by Sharyland for the transmission line that it proposes in its application in this proceeding. Accordingly, Mr. Rogers

and the Canyon Ridge Cattle Company may be impacted by decisions made in this proceeding and have justiciable interests that may be adversely affected by the outcome of this proceeding and on that basis seek to intervene.

The address for Mr. Rogers and the Canyon Ridge Cattle Company is as follows:

Daniel L. Rogers
Canyon Ridge Cattle Company
506 S. Lipscomb Street
Amarillo, Texas 79101

5. The Genevieve Currie Green Revocable Trust owns property located in Sections 6, 7, 8, 26, and 27, Block 6, I&GN RR Co. Survey, Randall County, Texas (Abstract #255, 256, 257, 275, and 276), Section 7, R. A. Terrill Survey, Randall County, Texas (Abstract #1514), and Section 7, W. J. Clark Survey, Randall County, Texas (Abstract #1426) that will be crossed by one or more of the proposed routes selected by Sharyland for the transmission line that it proposes in its application in this proceeding. Accordingly, the Genevieve Currie Green Revocable Trust may be impacted by decisions made in this proceeding and has a justiciable interest that may be adversely affected by the outcome of this proceeding and on that basis seeks to intervene.

The address for the Genevieve Currie Green Revocable Trust is as follows:

Genevieve Currie Green Revocable Trust
c/o J J Currie Ranch, Inc.
1600 Bellaire Street
Amarillo, Texas 79106-5804

6. The above-identified individuals and entities may be jointly referred to as the Currie Family Interests.

7. The Currie Family Interests will be jointly represented by the following authorized representative:

Georgia N. Crump
Lloyd Gosselink Rochelle & Townsend, P.C.
816 Congress Avenue, Suite 1900
Austin, Texas 78701
Telephone: 512-322-5800
Facsimile: 512-472-0532
gcrump@lglawfirm.com

8. The Currie Family Interests request that all pleadings, orders, correspondence and filings in this proceeding be served on their legal representative. Counsel agrees to accept one copy of filings on behalf of all members of the Currie Family Interests.

WHEREFORE, PREMISES CONSIDERED, the Currie Family Interests indentified herein respectfully request that this Motion to Intervene be granted, that they be allowed to participate as parties to this proceeding, and for such further relief to which they may be entitled.

Respectfully submitted,


**LLOYD GOSSELINK
ROCHELLE & TOWNSEND, P.C.**
816 Congress Avenue, Suite 1900
Austin, Texas 78701
(512) 322-5800
Fax: (512) 472-0532
gcrump@lglawfirm.com



GEORGIA N. CRUMP
State Bar No. 05185500

CERTIFICATE OF SERVICE

I hereby certify that on this 25th day of June, 2010, a true and correct copy of the foregoing document is being served via facsimile, U.S. mail, and/or hand delivery to all parties of record.



GEORGIA N. CRUMP