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APPLICATION OF ONCOR ELECTRIC §
DELIVERY COMPANY, LLC TO §
AMEND A CERTIFICATE OF §
CONVENIENCE AND NECESSITY FOR §
THE WILLOW CREEK-HICKS 345-KV §
CREZ TRANSMISSION LINE IN §
DENTON, PARKER, TARRANT §
AND WISE COUNTIES §

BEFORE THE STATE OFFICE OF ADMINISTRATIVE HEARINGS

ON REFERRAL FROM THE PUBLIC UTILITY COMMISSION OF TEXAS

TODD GROUP, LTD.'S MOTION TO INTERVENE

NOW COMES Todd Group, Ltd., ("Todd Group") and files this Motion to Intervene, pursuant to P.U.C. PROC. R. 22.103 and 22.104 in the above-referenced proceeding and in support thereof would respectfully show as follows:

I.
IDENTITY OF INTERVENOR

The name and address of Movant is as follows:

Todd Group, Ltd.
c/o Rick G. Sorenson, Registered Agent
McDonald Sanders, P.C.
777 Main Street, Suite 1300
Fort Worth, Texas 76102
Phone: (817) 336-8651
Facsimile: (817) 334-0271

II.
LEGAL REPRESENTATIVE

The name and contact information for Todd Group's authorized legal representative is as follows:

Rick G. Sorenson
McDonald Sanders, P.C.
777 Main Street, Suite 1300
Fort Worth, TX 76102

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Phone: (817) 336-8651
Facsimile: (817) 334-0271
Email: rsorenson@mcdonaldlaw.com

Todd Group requests that all pleadings, orders, correspondence and filings be served on the above-named authorized legal representative.

III.
BASIS FOR INTERVENTION

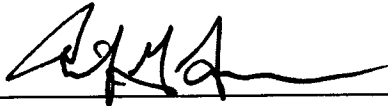
Todd Group owns property in Tarrant County directly affected by the proposed Willow Creek - Hicks 345 kV transmission line sought by Oncor Electric Delivery Company, LLC ("Oncor"). Todd Group has been listed by Oncor as a directly affected land owner on links GGG, JJJ, and OOO of said transmission line. Therefore, Todd Group has a justiciable interest in this proceeding, may be adversely affected by the outcome of this proceeding, and has standing to intervene.

IV.
CONCLUSION AND PRAYER

WHEREFORE, PREMISES CONSIDERED, Todd Group respectfully requests that this Motion to Intervene be granted, that Todd Group be allowed to participate as a party to this proceeding and that Todd Group be granted such further relief to which it may be entitled.

Respectfully submitted,

McDONALD SANDERS,
A Professional Corporation


By:  _____

Rick G. Sorenson
State Bar No. 18848350
John W. Wright
State Bar No. 22044550
777 Main Street, Suite 1300
Fort Worth, Texas 76102
(817) 336-8651
(817) 334-0271 Fax

ATTORNEYS FOR TODD GROUP, LTD.

CERTIFICATE OF SERVICE

I, Rick Sorenson, certify that a copy of this document was served on all parties of record in this proceeding on this 9th day of July, 2010, via facsimile, U.S. mail and/or hand delivery.

 _____
Rick G. Sorenson