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**DOCKET NO. 38484**

**APPLICATION OF WIND ENERGY §  
TEXAS, LLC FOR A CERTIFICATE OF §  
CONVENIENCE AND NECESSITY FOR §  
THE SCURRY COUNTY SOUTH - LONG §  
DRAW – GRELTON - ODESSA 345 KV §  
CREZ TRANSMISSION LINES IN §  
SCURRY, MITCHELL, BORDEN, §  
HOWARD, DAWSON, MARTIN, §  
MIDLAND, AND ECTOR COUNTIES §**

**PUBLIC UTILITY COMMISSION  
OF TEXAS**

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**MOTION TO INTERVENE OF PSEG TEXAS, LP**

Pursuant to the Public Utility Regulatory Act, Title II, TEX. UTIL. CODE ANN. (Vernon 2004 and Supp. 2006) and Sections 22.101, 22.103 and 22.104 of the Rules of Practice and Procedure of the Public Utility Commission of Texas (“Commission” or “PUCT”), PSEG Texas, LP (“PSEG Texas”) hereby files this Motion to Intervene in the above-captioned proceeding. In support of its motion, PSEG Texas respectfully states:

**I. STANDING TO INTERVENE**

PSEG Texas develops, constructs, owns and operates natural gas-fired electric generating facilities in the ERCOT through its 100 percent ownership interest in Guadalupe Power Partners, LP (“GPP”), a 1,000 MW natural gas-fired electric generating facility located in Marion, Guadalupe County, Texas, and in Odessa-Ector Power Partners, L.P. (“OEPP”), a 1,000 MW natural gas-fired electric generating facility located in Odessa, Ector County, Texas. The 1000 MW Odessa-Ector Power Partners facility currently connects at the 345 kV level in Odessa, Texas and this facility is directly affected by discussions underway in this proceeding.

**II. AUTHORIZED REPRESENTATIVES**

The authorized representatives of PSEG Texas for service of all pleadings and other documents in this docket are:

Jodi Moskowitz  
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and Compliance  
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The name, address, telephone number, facsimile number and e-mail address of  
PSEG Texas's legal counsel is:

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PSEG Texas further requests that Ms. Moskowitz, Ms. Philips, Mr. Khalatnikov,  
Ms. Wagner and Mr. Parish be added to the official PUCT service list in this docket. Mr.  
Parish will be designated lead counsel for PSEG Texas.<sup>1</sup>

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<sup>1</sup> P.U.C. PROC. R. 22.101(c).

**III. PRAYER**

PSEG Texas respectfully requests that its motion to intervene be granted and that it receive such other and further relief to which it may show itself justly entitled.

Respectfully submitted,



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William R. Parish, Jr.

ATTORNEY FOR PSEG TEXAS, LP

Date: September 16, 2010

**CERTIFICATE OF SERVICE**

I certify that a copy of this document was served on all parties of record in this 16<sup>th</sup> day of September 2010 on all parties of record in Docket No. 38484 in the manner specified in Order No. 3.

  
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William R. Parish, Jr.