

Control Number: 38517



Item Number: 165

Addendum StartPage: 0

SOAH Docket No. 473-10-5923 PUC Docket No. 38517

APPLICATION OF ONCOR	§				
ELECTRIC DELIVERY CO., LLC TO	§				
AMEND ITS CERTIFICATE OF	§				
CONVENIENCE AND NECESSITY	§		Ø.	-	
FOR A PROPOSED CREZ 345 kV	§		Ē.	2	,me,
TRANSMISSION LINE IN HASKELL,	§	PUBLIC UTILITY COMN	a is si	ON	
JONES, THROCKMORTON,	§		Z -	-1	\supseteq
SHACKELFORD, YOUNG,	§	OF TEXAS	<u>Ω</u> ~	-	
STEPHENS, JACK, PALO PINTO,	§		<u>m</u> E		m
WISE, AND PARKER COUNTIES,	§		亲丢	Ö	Ü
TEXAS	§		38	£	
(Clear Crossing – Willow Creek CCN)	§		Š		_

TEXAS-NEW MEXICO POWER COMPANY'S MOTION TO INTERVENE

COMES NOW TEXAS-NEW MEXICO POWER COMPANY ("TNMP") and, pursuant to P.U.C. PROC. R. 22.103 and 22.104, files this Motion to Intervene in the above-referenced proceeding and in support thereof would respectfully show as follows:

Authorized Representative

The names, mailing address, telephone number, and email address of the Movant's authorized representative is:

Scott Seamster	Stacy Whitehurst
Corporate Counsel	Supervisor, Regulatory Analysis
Texas New Mexico Power Company	Texas New Mexico Power Company
225 E. John Carpenter Fwy, Suite 1500	225 E. John Carpenter Fwy, Suite 1500
Irving, Texas 75062	Irving, Texas 75062
Tel: 469.484.8577 Fax: 469.484.8033	Tel: 469-484-8586 Fax: 469-484-8032
Scott.seamster@pnmresources.com	Stacy.whitehurst@pnmresources.com

TNMP requests that all pleadings, orders, correspondence, and filings be served on its legal representative listed above. For purposes of service, a single service copy may be sent to TNMP via facsimile or electronic mail delivery.

Standing to Intervene

TNMP is a transmission and distribution utility, with facilities located in Palo Pinto and Stephens counties which may be directly affected, as that term is defined in P.U.C. PROC. R. 22.52(a)(3), by the proposed Oncor transmission line that is the subject of this docket. TNMP therefore has a justiciable interest in the proceeding that is the subject of this docket.

WHEREFORE, PREMISES CONSIDERED, Texas-New Mexico Power Company respectfully requests that this Motion to Intervene be granted, that TNMP be allowed to participate as a party to this proceeding, and for all such further relief to which it may be entitled.

Respectfully submitted,

TEXAS-NEW MEXICO POWER COMPANY

Scott Seamster Corporate Counsel

Texas-New Mexico Power Company

225 E. John Carpenter Fwy

Suite 1500

Irving, Texas 75062

Tel: 469.484.8577 Fax: 469.484.8033 Scott.seamster@pnmresources.com

Certificate of Service

I hereby certify that on this ______ day of ______ September, 2010, a true and correct copy of the foregoing document is being served via email, facsimile, or U.S. mail on all parties of record.

Counsel