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DOCKET NO. 38577

PROCEEDING TO DETERMINE §  
WHETHER TO MODIFY THE §  
CREZ TRANSMISSION PLAN §

BEFORE THE  
PUBLIC UTILITY COMMISSION  
OF TEXAS

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PUBLIC UTILITY COMMISSION  
OF TEXAS

**ONCOR ELECTRIC DELIVERY COMPANY LLC'S  
MOTION TO INTERVENE**

**TO THE HONORABLE PUBLIC UTILITY COMMISSION OF TEXAS:**

COMES NOW Oncor Electric Delivery Company LLC ("Oncor") and files this Motion to Intervene ("Motion") in the above-referenced docket pursuant to P.U.C. PROC. R. 22.103 and 22.104. This motion is timely filed on or before October 7, 2010. Oncor respectfully shows as follows:

**I. ONCOR'S AUTHORIZED REPRESENTATIVES**

The following individuals are Oncor's authorized representatives for purposes of this proceeding:

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All correspondence, pleadings, discovery, and any other documents should be served on Oncor's authorized representatives.

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## **II. BACKGROUND**

The current docket was established to determine whether the Public Utility Commission of Texas ("Commission") should modify the Competitive Renewable Energy Zone ("CREZ") transmission plan ("CTP") approved by the Commission in Docket No. 33672.<sup>1</sup> This docket is limited to determining whether the Gillespie-Newton transmission line that LCRA Transmission Services Corporation has been ordered to build is necessary, or whether there are more cost-effective solutions than the Gillespie-Newton transmission line to accomplish the goals of the CTP in conformance with PURA § 39.904(g)(2) and P.U.C. SUBST. R. 25.174(c).

## **III. STANDING TO INTERVENE**

The Commission has previously approved two Oncor applications to amend its certificates of convenience and necessity to construct two CREZ transmission projects known as Brown-Newton and Newton-Killeen (collectively, the "Oncor Projects").<sup>2</sup> The Oncor Projects share the Newton endpoint with the Gillespie-Newton transmission line that is at issue in this docket. Oncor is responsible for constructing the Newton Switching Station that will serve as the common endpoint for the Oncor Projects and the Gillespie-Newton transmission line. The determination to be made in this proceeding regarding the necessity of the Gillespie-Newton transmission line may directly impact the nature and specifications of the Newton Switching Station. Accordingly, Oncor has a justiciable interest that may be adversely affected by the outcome of this proceeding, and has satisfied the requirements for standing to intervene in P.U.C. PROC. R. 22.103.

Oncor's interest in this proceeding relates solely to the Newton Switching Station. Accordingly, Oncor requests to intervene in this proceeding in order to remain informed of all issues and discussions relating to the Newton Switching Station, and to address any such issues should they arise.

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<sup>1</sup> *Commission Staff's Petition for the Designation of Competitive Renewable Energy Zones*, Docket No. 33672, Order on Rehearing (Nov. 6, 2007).

<sup>2</sup> *Application of Oncor Electric Delivery Company LLC to Amend its Certificate of Convenience and Necessity for the Brown-Newton 345-kV CREZ Transmission Line in Brown, Mills, Lampasas, McCulloch, and San Saba Counties, Texas*, Docket No. 37464 (April 5, 2010); *Application of Oncor Electric Delivery Company LLC to Amend a Certificate of Convenience and Necessity for the Newton-Killeen CREZ 345-kV Transmission Line in Bell, Burnet, and Lampasas Counties, Texas*, Docket No. 37463 (April 5, 2010).

**IV. CONCLUSION**

WHEREFORE, PREMISES CONSIDERED, Oncor respectfully requests that this Motion be granted, that it be granted party status in this proceeding, and that it be granted such other and further relief to which it may show itself entitled.

Respectfully submitted,

**VINSON & ELKINS LLP**

By: Megan Davis

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**ATTORNEYS FOR ONCOR ELECTRIC  
DELIVERY COMPANY LLC**

**CERTIFICATE OF SERVICE**

It is hereby certified that a copy of the foregoing has either been faxed, hand delivered, sent via First Class U.S. mail, or sent via Federal Express overnight mail, to the Staff of the Public Utility Commission of Texas, and to all other parties of record on this the 4<sup>th</sup> day of October, 2010.

Megan Davis