



Control Number: 38597



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APPLICATION OF ONCOR ELECTRIC
DELIVERY COMPANY LLC TO
AMEND A CERTIFICATE OF
CONVENIENCE AND NECESSITY
FOR THE KRUM WEST TO ANNA
345-KV CREZ TRANSMISSION LINE
IN COLLIN, COOKE, DENTON, AND
GRAYSON COUNTIES

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PUBLIC UTILITY COMMISSION
OF TEXAS

MOTION TO INTERVENE

COMES NOW Harold V. Murphy, Donnette G. Murphy, Edward Paxton Sandidge, III, Lynette Sandidge, Sharon Scott, Michael Gooch, Christy Gooch, Johnnie Robinson, Pat Robinson, Roberson Ranch, Marcus J. Schaefer, Donna Schaefer, C. Kent Adams, Lone Star Partners, Richard W. Thompson III, (hereinafter "Movants"), and file this Motion to Intervene in the above proceeding pursuant to Public Utility Commission ("PUC" or "Commission") Procedural Rules 22.103 and 22.104, and in support thereof, would respectfully show the following:

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I. IDENTITY OF INTERVENORS

The name and address of the Movants opposing Link R22 herein is as follows:

- Harold V. Murphy & Donnette G. Murphy
- Edward Paxton Sandidge, III & Lynette Sandidge
- Sharon Scott
- Michael Gooch & Christy Gooch
- Johnnie Robinson & Pat Robinson, Roberson Ranch
- Marcus J. Schaefer & Donna Schaefer
- C. Kent Adams, Lone Star Partners
- Richard W. Thompson, III
- 2545 Lone Star Road
- Celina, TX 75009

1114

II. LEGAL REPRESENTATIVE

The name, mailing address, telephone number, fax number and e-mail address of Movant's authorized legal representative is as follows:

Byron R. Berry
Hayes, Berry, White & Vanzant LLP
512 West Hickory, Suite 100
Denton, TX 76201
(P. O. Box 50149, Denton, TX 76202)
940-387-3518
Fax: 866-576-2577
bberry@hbwvlaw.com

Movants request that all correspondence, pleadings, briefs and other documents in this proceeding be served upon Movants' legal representative at the address shown above.

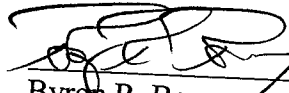
III. INTERVENOR'S JUSTICIABLE INTEREST

Movants own property adjacent to or crossed by one or more of the preferred alternative routes proposed by Oncor Electric Delivery Company LLC (specifically Link R22) in this proceeding and have received notice that they are directly affected landowners. Movants accordingly, have a justiciable interest that may be adversely affected by the application and have standing in this proceeding pursuant to P.U.C. Proc. R. § 22.103.

WHEREFORE, PREMISES CONSIDERED, Movants respectfully request that this motion to intervene be granted, that Movants be allowed to participate as parties to this proceeding, and for such other and further relief to which they may be justly entitled.

Respectfully submitted.

HAYES, BERRY, WHITE & VANZANT LLP
512 West Hickory, Suite 100
P. O. Box 50149
Denton, TX 76206
Telephone: 940-387-3518
Facsimile: 866-576-2577



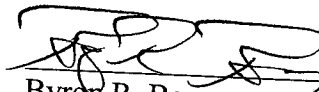
Byron R. Berry

State Bar No. 02230300

ATTORNEY FOR Harold V. Murphy, Donnette
G. Murphy, Edward Paxton Sandidge, III,
Lynette Sandidge, Sharon Scott, Michael
Gooch, Christy Gooch, Johnnie Robinson,
Pat Robinson, Robinson Ranch, Marcus J.
Schaefer, Donna Schaefer, C. Kent Adams,
Lone Star Partners, Richard W. Thomspson,
III

CERTIFICATE OF SERVICE

I hereby certify that on October 7, 2010, a true and correct copy of the foregoing document was served on all parties of record in this proceeding, in accordance with SOAH Order No. 2.



Byron R. Berry