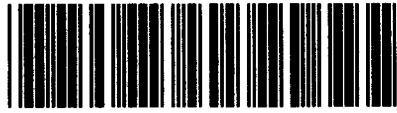




Control Number: 38825



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Addendum StartPage: 0

Request to Intervene in PUC Docket No. 38825

RECEIVED
SUBMITTED
DEC - 9 2010
FILING CLERK

The following information must be submitted by the person requesting to intervene in this proceeding. This completed form will be provided to all parties in this docket. If you DO NOT want to be an intervenor, but still want to file comments, please complete the "Comments" page.

Mail this completed form and 10 copies to:

Public Utility Commission of Texas
Central Records
Attn: Filing Clerk
1701 N. Congress Ave.
P.O. Box 13326
Austin, TX 78711-3326

First Name: James R. Last Name: Currie, et al.
Phone Number: (432) 685-8551 Fax Number: (432) 684-3132
Address, City, State: c/o Bill Howard, 500 W. Illinois, Ste. 300, Midland, TX 79701

I am requesting to intervene in this proceeding. As an INTERVENOR, I understand the following:

- I am a party to the case;
- I am required to respond to all discovery requests from other parties in the case;
- If I file testimony, I may be cross-examined in the hearing;
- If I file any documents in the case, I will have to provide a copy of that document to every other party in the case; and
- I acknowledge that I am bound by the Procedural Rules of the Public Utility Commission of Texas (PUC) and the State Office of Administrative Hearings (SOAH).

Please check one of the following:

- I own property with a habitable structure located near one or more of the utility's proposed routes for a transmission line.
- One or more of the utility's proposed routes would cross my property.
- Other. Please describe and provide comments. You may attach a separate page, if necessary. _____

Please see attached.

Signature of person requesting intervention:

James R. Currie Date: 12/3/10

Effective: January-1, 2003

157

SOAH DOCKET NO. 473-11-1266
P.U.C. DOCKET NO. 38825

APPLICATION OF WIND ENERGY § BEFORE THE
TRANSMISSION TEXAS, LLC TO §
AMEND ITS CERTIFICATE OF §
CONVENIENCE AND NECESSITY FOR §
THE LONG DRAW TO SAND BLUFF, §
SAND BLUFF TO DIVIDE, AND § PUBLIC UTILITY COMMISSION
SAND BLUFF TO BEARKAT 345-KV CREZ §
TRANSMISSION LINES IN BORDEN, §
COKE, GLASSCOCK, HOWARD §
MITCHELL, AND STERLING §
COUNTIES, TEXAS § OF TEXAS

**MOTION TO INTERVENE BY
OWNERS OF THE JAMES R. CURRIE, ET AL. RANCH**

NOW COME, JAMES R. CURRIE, INDIVIDUALLY AND AS TRUSTEE, JIMMIE R. CURRIE, CYNTHIA C. HOWARD AND DARLA C. TAYLOR (collectively, "James R. Currie et al. Ranch Movants") and file this their Motion to Intervene in the above-referenced proceeding and in support thereof would show as follows:

**I.
IDENTITY OF INTERVENORS**

The names and addresses of the James R. Currie et al. Ranch Movants and their representatives are as follows:

James R. Currie, Individually and as Trustee
Jimmie R. Currie
Cynthia C. Howard
Darla C. Taylor
c/o Bill Howard
500 W. Illinois, Suite 300
Midland, Texas 79701

II.
LEGAL REPRESENTATIVE

The name and contact information of the James R. Currie et al. Ranch Movants' authorized legal representatives is as follows:

J Pete Laney
Law Offices of J Pete Laney
Westgate Building
1122 Colorado, Suite 111
Austin, Texas 78701
Telephone No.: (512) 473-0404
Facsimile No.: (512) 672-6123
jpete@jpetelancylaw.com

James R. Currie et al. Ranch Movants request that all pleadings, orders, correspondence, discovery and filings be served on their legal counsel.

III.
BASIS FOR INTERVENTION

As one or more of the Wind Energy Transmission Texas, LLC proposed Sand Bluff to Bearkat Substation routes would cross the James R. Currie et al. Ranch Movants' lands, James R. Currie et al. Ranch Movants have a judiciable interest which may be adversely affected by the outcome of this proceeding and are therefore entitled to intervene in this proceeding. James R. Currie et al. Ranch Movants specifically object as follows:

AP7 – unacceptable. This proposed line crosses the northern portion of approximately one (1) mile of cultivated and irrigated crop land.

AG7 – unacceptable. This proposed line crosses through the middle of an approximate 200-acre field which is equipped with subterranean irrigation, as well as crossing within approximately 1100 feet of a residence.

BB7, BR7 and BY7 – unacceptable. Although somewhat removed from the residences and cultivated lands, these proposed lines would dissect the ranch by passing directly through the property, and the negative impact of a high capacity electric transmission line on the aesthetics and property value, render these proposed lines unacceptable as well.

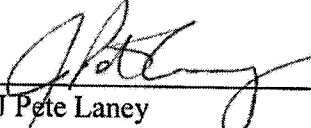
This Motion to Intervene is timely filed within forty-five (45) days of filing of the Application and in accordance with P.U.C. PROC. R. 22.104(b).

IV.
CONCLUSION AND PRAYER

WHEREFORE, PREMISES CONSIDERED, James R. Currie et al. Ranch Movants respectfully request that this Motion to Intervene be granted, that James R. Currie et al. Ranch Movants be permitted to participate in this proceeding as a party thereto for all purposes, that the Sandbluff to Bearkat Substation route ultimately permitted by the Texas Public Utilities Commission not contain links AP7, AG7, BB7, BR7 or BY7 and that James R. Currie et al. Ranch Movants be granted all other relief, either at law or equity, to which they may be entitled.

Respectfully submitted,

Law Office of J Pete Laney
Westgate Building
1122 Colorado, Suite 111
Austin, Texas 78701
Telephone No.: (512) 473-0404
Facsimile No.: (512) 672-6123
Email: jpete@jpetelaneylaw.com


By: 

J Pete Laney
State Bar No. 24036942

ATTORNEYS FOR JAMES R. CURRIE,
INDIVIDUALLY AND AS TRUSTEE,
JIMMIE R. CURRIE, CYNTHIA C.
HOWARD, AND DARLA C. TAYLOR

CERTIFICATE OF SERVICE

I certify that on this 10th day of December 2010, a true and correct copy of the foregoing was served on all parties of record via e-mail, facsimile or regular mail.


J Pete Laney