



Control Number: 38825



Item Number: 47

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# Request to Intervene in PUC Docket No. 38825

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: William James Last Name: Stroman, Jr., et al.  
Phone Number: (325) 378-3209 Fax Number: \_\_\_\_\_  
Address, City, State: P.O. Box 4, Private Road 404/Hwy. 163 North, Sterling City, Texas 76951

2010 DEC 21  
11:51 AM  
RECEIVED

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

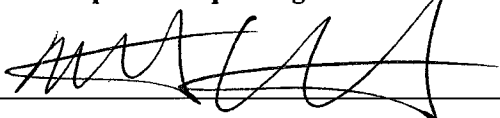
- I am a party to the case;
- I am required to respond to all discovery requests from other parties in the case;
- If I file testimony, I may be cross-examined in the hearing;
- If I file any documents in the case, I will have to provide a copy of that document to every other party in the case; and
- 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:**



Date: 12/1/10

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 WILLOW CREEK RANCH**

NOW COME WILLIAM JAMES STROMAN, JR., AS INDEPENDENT EXECUTOR OF THE ESTATE OF WILLIAM JAMES STROMAN, DECEASED, CLEO LANE STROMAN, BY AND THROUGH HER ATTORNEY-IN-FACT WILLIAM JAMES STROMAN, JR., ANN STROMAN BELL, DAVID LANE STROMAN (collectively “Willow Creek 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 Willow Creek Movants and their representatives are as follows:

William James Stroman, Jr., as Independent Executor  
of the Estate of William James Stroman, Deceased  
P. O. Box 4  
Sterling City, Texas 76951

Cleo Lane Stroman, by and through her Attorney-in-Fact,  
William James Stroman, Jr.  
P. O. Box 4  
Sterling City, Texas 76951

Ann Stroman Bell  
6213 Homestead Boulevard  
Midland, Texas 79707

David Lane Stroman  
5505 Grassland Boulevard  
Midland, Texas 79707

**II.**  
**LEGAL REPRESENTATIVE**

The name and contact information of the Willow Creek Movants' authorized legal representatives is as follows:

Matt Catalano  
David L. Stroman  
Cotton, Bledsoe, Tighe & Dawson, PC  
P. O. Box 2776  
Midland, Texas 79702  
500 W. Illinois, Suite 300  
Midland, Texas 79701  
(432) 684-5782  
(432) 685-8586  
(432) 684-3184 – Fax  
[mcatalano@cbtd.com](mailto:mcatalano@cbtd.com)  
[dstroman@cbtd.com](mailto:dstroman@cbtd.com)

Willow Creek 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 Divide Substation routes would cross the Willow Creek Movants' lands, Willow Creek 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. Willow Creek Movants would more specifically show that the proposed links are unacceptable as follows:

BP6 – absolutely unacceptable. The Stromans use Private Road 404 as their primary entrance on to Willow Creek. The location of this line would cause extreme interference with ingress and egress, and would provide a very unsightly welcome to a beautiful family ranch.

AY6 – absolutely unacceptable. Although situated approximately one mile north of the Willow Creek Guest House and the Stroman's primary residence, a transmission line in this location would be detrimental to the aesthetics of the ranch. A portion of the Stromans' ranching operation is the rental of the Willow Creek Guest House. A large draw to the Guest House is solitude and a feeling of being in an isolated part of the country. The AY6 line would be devastating to the view from the Stromans' home, as well as to the appeal of the Guest House.

AQ6 – absolutely unacceptable. This location appears to cross right through a main water well and set of working pens and would join AY6.

AG6 – absolutely unacceptable. This is one of the remotest portions of the ranch and is very valuable for deer hunting and recreational purposes.

BJ6 – absolutely unacceptable. The same concerns voiced about BP6 are applicable to this line. Recognizing that some may prefer a line along the highway, Willow Creek movants would prefer to have this line located on the east side of Highway 163 if it is a must.

CS6 – absolutely unacceptable. This line is undesirable as it would have to be an extension of one of two unacceptable lines.

BI6 – absolutely unacceptable. If a line along the highway is a must, Willow Creek movants would prefer it be on the east side of Highway 163.

BF6 – absolutely unacceptable. This line crosses directly through a water lot and set of shipping pens which serve the entire portion of the Ranch located east of Highway 163.

AW6 and BA6 – absolutely unacceptable. Although somewhat removed from the Ranch headquarters and residences, 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).

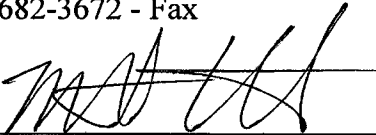
**IV.**  
**CONCLUSION AND PRAYER**

WHEREFORE, PREMISES CONSIDERED, Willow Creek Movants respectfully request that this Motion to Intervene be granted, that Willow Creek Movants be permitted to participate in this proceeding as a party thereto for all purposes, that the Sandbluff to Divide Substation route ultimately permitted by the Texas Public Utilities Commission not contain links BP6, AY6, AQ6, AG6, BJ6, CS6, BI6, AW6 or BA6, and that Willow Creek Movants be granted all other relief, either at law or equity, to which they may be entitled.

Respectfully submitted,

COTTON, BLEDSOE, TIGHE & DAWSON,  
A Professional Corporation  
P. O. Box 2776  
Midland, Texas 79702  
(432) 684-5782  
(432) 682-3672 - Fax

By: \_\_\_\_\_

  
Matt Catalano  
State Bar No. 24003918  
David L. Stroman  
State Bar No. 24047360

ATTORNEYS FOR WILLIAM JAMES  
STROMAN, JR., AS INDEPENDENT  
EXECUTOR OF THE ESTATE OF WILLIAM  
JAMES STROMAN, DECEASED, CLEO LANE  
STROMAN, BY AND THROUGH HER  
ATTORNEY-IN-FACT WILLIAM JAMES  
STROMAN, JR., ANN STROMAN BELL and  
DAVID LANE STROMAN