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APPLICATION OF SHARYLAND
UTILITIES, LP TO AMEND ITS
CERTIFICATE OF CONVENIENCE AND
NECESSITY FOR THE PROPOSED
WHITE DEER TO SILVERTON 345-KV
CREZ TRANSMISSION LINE IN
ARMSTRONG, BRISCOE, CARSON,
DONLEY, GRAY, AND SWISHER
COUNTIES

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BEFORE THE

PUBLIC UTILITY COMMISSION

OF TEXAS

**CROSS TEXAS TRANSMISSION LLC'S
MOTION TO INTERVENE**

TO THE HONORABLE ADMINISTRATIVE LAW JUDGE:

COMES NOW Cross Texas Transmission, LLC ("Cross Texas") and files this Motion to Intervene ("Motion") in the above-referenced docket pursuant to P.U.C. PROC. R. 22.103 and 22.104. In support hereof, Cross Texas respectfully shows as follows:

I. CROSS TEXAS'S AUTHORIZED REPRESENTATIVES

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

James W. Checkley, Jr.
John K. Arnold
Locke Lord Bissell & Liddell LLP
100 Congress Avenue, Suite 300
Austin, Texas 78701
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E-mail: cbrandt@lspower.com

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

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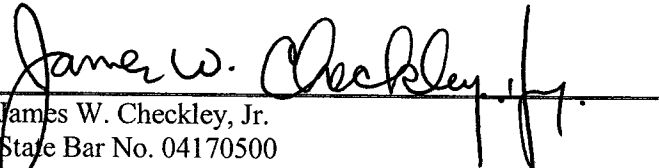
II. STANDING TO INTERVENE

Sharyland Utilities, L.P. ("Sharyland") filed its application in this docket on November 11, 2020, requesting regulatory approval to amend its certificate of convenience and necessity ("CCN") to construct a 345-kV Competitive Renewable Energy Zone ("CREZ") transmission line from Sharyland's new White Deer Substation to its new Silverton Substation ("White Deer to Silverton Line"). Cross Texas is a transmission service provider selected by the Public Utility Commission of Texas to design, construct, and operate three CREZ transmission lines in the Panhandle. The White Deer station will be connected to Cross Texas's Gray to White Deer line and the Silverton station will be connected to Cross Texas's Silverton to Tesla line. Depending on the routes that are selected for each line, the possibility exists that the White Deer to Silverton Transmission Line could be certified in the same corridor(s) for a portion of each route. Therefore, Cross Texas is directly and substantially impacted by the issues raised and relief requested by Sharyland's application and has a justiciable interest that may be adversely affected by the outcome of this proceeding. Accordingly, Cross Texas has satisfied the requirements for standing to intervene in P.U.C. PROC. R. 22.103 and requests that it be granted intervenor status in this docket.

III. CONCLUSION

WHEREFORE, PREMISES CONSIDERED, Cross Texas 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,



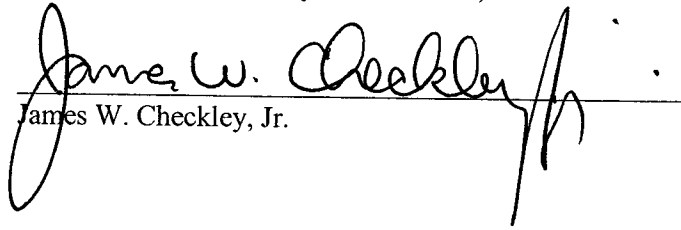
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**ATTORNEYS FOR
CROSS TEXAS TRANSMISSION, LLC**

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 17th day of November, 2010.


James W. Checkley, Jr.