

Control Number: 40049



Item Number: 36

Addendum StartPage: 0

PUC DOCKET NO. 40049

PUC DOCKET NO. 40049		
A DDI ICATION OF CENTED DOINT	c	Made Milia
APPLICATION OF CENTERPOINT	8	1 C/20 5
ENERGY HOUSTON ELECTRIC, LLC	§	1 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1
FOR A CERTIFICATE OF	§	PUBLIC UTILITY COMMISSION
CONVENIENCE AND NECESSITY FOR	§	
A PROPOSED 138 KV TRANSMISSION	§	OF TEXAS
LINE WITHIN HARRIS AND	Š	
MONTGOMERY COUNTIES, TEXAS	8	

MOTION TO INTERVENE OF WILDWOOD FOREST APARTMENTS, L.P.

Pursuant to Public Utility Commission ("PUC") Procedural Rules 22.101, 22.103, and 22.104, Wildwood Forest Apartments, L.P. ("Wildwood") files this Motion to Intervene in the above-referenced proceeding, and in support thereof, respectfully shows the following:

I. **IDENTITY OF INTERVENORS**

The name and address of Wildwood is as follows:

Wildwood Forest Apartments, L.P. 455 Wildwood Forest Drive Spring, Texas 77380

II. LEGAL REPRESENTATIVE

The name, mailing address, telephone and fax numbers, and e-mail addresses of Wildwood's authorized legal representatives are as follows:

> Edward C. Small Jacob P. Arechiga JACKSON WALKER L.L.P. 100 Congress Ave, Suite 1100 Austin, TX 78701 (512) 236-2000 - Telephone (512) 391-2104 - Facsimile esmall@jw.com jarechiga@jw.com

Wildwood requests that all correspondence, pleadings, briefs, and other documents in the proceeding be served upon Wildwood's legal representatives at the address shown above.

III. INTERVENOR'S JUSTICIABLE INTEREST

Wildwood owns property, featuring a large apartment complex, adjacent to or crossed by alternative routes proposed by CenterPoint Energy Houston Electric, LLC ("CenterPoint") in this proceeding and has received notice from CenterPoint that it is a directly affected landowner in this proceeding. Wildwood, accordingly, has a justiciable interest that may be adversely affected by the application and has standing in this proceeding pursuant to P.U.C. Proc. R. § 22.103.

Wildwood respectfully requests that this Motion to Intervene be granted, that Wildwood be allowed to participate as a party to this proceeding, and for such further relief to which it may be entitled.

Respectfully submitted,

JACKSON WALKER L.L.P. 100 Congress Ave, Suite 1100 Austin, TX 78701 (512) 236-2000 – Telephone (512) 391-2104 – Facsimile

EDWARD C. SMALL

State Bar No. 18515000

JACOB P. ARECHIGA State Bar No. 24069309

ATTORNEYS FOR WILDWOOD FOREST APARTMENTS, L.P.

CERTIFICATE OF SERVICE

I certify that on this 24th day of February, 2012, a true and correct copy of the foregoing document was served via hand delivery, facsimile, email, and/or U.S mail to the Public Utility Commission of Texas, all parties of record, and all entities that have moved to intervene as of the time and date of this filing.

ACOB ARECHIGA