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PUC DOCKET NO. 40537

APPLICATION OF SHARYLAND §  
UTILITIES, LP TO AMEND A §  
CERTIFICATE OF CONVENIENCE §  
AND NECESSITY FOR THE §  
GARDENDALE TO GRADY 138-KV §  
TRANSMISSION LINE IN MARTIN §  
AND MIDLAND COUNTIES §

PUBLIC UTILITY COMMISSION

OF TEXAS

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**VANCE AND PATRICIA LUCKIE'S MOTION TO INTERVENE**

TO THE HONORABLE ADMINISTRATIVE LAW JUDGE:

NOW COMES, Vance and Patricia Luckie ("Luckie"), pursuant to Public Utility Commission ("PUC") Procedural Rules 22.101, 22.103 and 22.104, and files this Motion to Intervene in the above referenced proceeding, and in support thereof, respectfully shows the following:

**I. Authorized Representative**

Attorneys Patrick L. Reznik and Cassie Gresham pursuant to P.U.C. Proc. R. 22.101(a), hereby notice their appearance as counsel on behalf of Intervenor Vance and Patricia Luckie in the above-styled and numbered proceeding before the State Office of Administrative Hearings.

The name, address, and telephone number of Intervenor's authorized representative is as follows:

Patrick L. Reznik  
**BRAUN & GRESHAM, PLLC**  
P.O. Box 1148  
Dripping Springs, Texas 78620  
512-894-5426 (telephone)  
512-894-3405 (fax)  
Email: [preznik@braungresham.com](mailto:preznik@braungresham.com)

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Luckie requests that the Commission and all parties to this proceeding serve copies of all notices, correspondence, pleadings, briefs, requests for information, and other documents on said authorized representative.

## **II. Jurisdiction**

The Commission has jurisdiction over the parties and subject matter of this proceeding pursuant to PURA § 37.053.

## **III. Basis for Intervention**

Luckie has a justiciable interest in this proceeding. Luckie owns property that may be directly impacted by one or more of the routes for Sharyland Utilities, LP (“Sharyland”) proposed transmission line. Luckie has been notified by Sharyland that their property may be directly affected, as that term is defined in P.U.C PROC. R 22.52 (a)(3), by the proposed transmission line that is the subject of this docket. Luckie, therefore, has standing to intervene in under P.U.C. PROC. R 22.103(b)(2). The Motion to Intervene is filed within 30 days of the date Sharyland filed its Application and therefore is timely under P.U.C. PROC. R 22.104(b). Luckie requests that this Motion to Intervene be granted and that they be recognized as a party.

## **IV. Acknowledgements**

Luckie acknowledges: (1) they will be a party to the case; (2) they will be required to respond to all discovery requests from other parties in the case; (3) if Luckie files testimony, other parties may cross-examine their representative at the hearing; (4) if they file any documents in this case, copies of those documents will be served to every other party in this case, except where modified by alternative service procedures set out

by order in this proceeding; and (5) they are bound by the Procedural Rules of the Public Utility Commission of Texas and the State Office of Administrative Hearings.

WHEREFORE, PREMISES CONSIDERED, Luckie respectfully requests that this Motion to Intervene be granted, that Luckie be allowed to participate in this proceeding as a party with all rights thereof to the full extent that they desire to do so, and for such further relief to which they may be entitled.

Respectfully submitted,

BRAUN & GRESHAM, PLLC

P.O. Box 1148 (Mailing)  
Dripping Springs, Texas 78620  
14101 Hwy. 290 W., Suite 1100B (Physical)  
Austin, Texas 78737  
512-894-5426 (telephone)  
512-894-3405 (fax)

By:

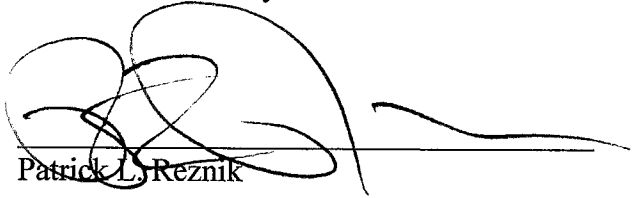
A handwritten signature in black ink, appearing to read "Patrick Reznik", written over a horizontal line.

Patrick Reznik  
State Bar No. 16806780  
Cassie Gresham  
State Bar No. 24045980

**ATTORNEYS FOR VANCE AND PATRICIA  
LUCKIE**

**CERTIFICATE OF SERVICE**

I certify that a copy of this document will be served on all parties of record on this the 7<sup>th</sup> day of September, 2012, in accordance with Public Utility Commission Procedural Rule 22.74.



Patrick L. Reznik