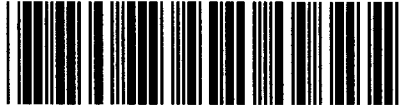


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SOAH DOCKET NO. 473-13-5207
PUC DOCKET NO. 41606

2013 AUG 16 PM 2:44

JOINT APPLICATION OF	§	BEFORE THE STATE OFFICE
ELECTRIC TRANSMISSION TEXAS,	§	
LLC AND SHARYLAND UTILITIES,	§	
L.P. TO AMEND THEIR	§	
CERTIFICATES OF CONVENIENCE	§	OF
AND NECESSITY FOR THE	§	
PROPOSED NORTH EDINBURG TO	§	
LOMA ALTA DOUBLE-CIRCUIT 345	§	ADMINISTRATIVE HEARINGS
KV TRANSMISSION LINE IN	§	
HIDALGO AND CAMERON	§	
COUNTIES, TEXAS	§	

**PARAMOUNT CITRUS II LLC AND PARAMOUNT CITRUS PACKING
COMPANY LLC'S MOTION TO INTERVENE**

TO THE HONORABLE ADMINISTRATIVE LAW JUDGE:

NOW COMES, Paramount Citrus II LLC and Paramount Citrus Packing Company LLC ("Paramount") pursuant to Public Utility Commission ("PUC") Procedural Rules §§ 22.101, 22.102, 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 Paramount in the above-styled and numbered proceeding before the State Office of Administrative Hearings ("SOAH").

Paramount is the successor-in-interest to Healds Valley Citrus LLC, a Delaware limited liability company, successor-in-interest by conversion to Healds Valley Farms, Inc., a Texas corporation and Rio Queen Citrus, Inc. Electric Transmission Texas, LLC

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and Sharyland Utilities, L.P. ("ETT/Sharyland") incorrectly list Healds Valley Farms, Inc. and Rio Queen Citrus, Inc. as the current owners.

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

Paramount 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

Paramount has a justiciable interest in this proceeding. Paramount owns property that may be directly impacted by one or more of the routes for Electric Transmission Texas, LLC and Sharyland Utilities, L.P. ("ETT/Sharyland") proposed transmission line. Paramount has been notified by ETT/Sharyland that its 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. Paramount, therefore, has standing to intervene under P.U.C. PROC. R 22.103(b)(2). The Motion to Intervene is filed within 45 days of the date ETT/Sharyland filed its Application and therefore is timely under P.U.C. PROC. R

22.104(b). Paramount requests that this Motion to Intervene be granted and that they be recognized as parties.

IV. Acknowledgements

Paramount 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 Paramount 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, Paramount respectfully requests that this Motion to Intervene be granted, that Paramount 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

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By: 

Patrick Reznik
State Bar No. 16806780

Cassie Gresham
State Bar No. 24045980

ATTORNEYS FOR PARAMOUNT

CERTIFICATE OF SERVICE

I certify that a copy of this document will be served on all parties of record on this the 16th day of August, 2013, in accordance with Public Utility Commission Procedural Rule 22.74.

A handwritten signature in black ink, appearing to read 'P. Reznik', is written over a horizontal line.

Patrick L. Reznik