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

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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	§	

FRANCIS L. PHILLIPP'S MOTION TO INTERVENE

TO THE HONORABLE ADMINISTRATIVE LAW JUDGE:

NOW COMES, Francis L. Phillipp ("Phillipp") 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 Phillipp in the above-styled and numbered proceeding before the State Office of Administrative Hearings ("SOAH").

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

Patrick L. Reznik
BRAUN & GRESHAM, PLLC
P.O. Box 1148

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Dripping Springs, Texas 78620
512-894-5426 (telephone)
512-894-3405 (fax)
Email: preznik@braungresham.com

Phillipp 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

Phillipp has a justiciable interest in this proceeding. Phillipp. 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. Phillipp 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. Phillipp, 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). Phillipp requests that this Motion to Intervene be granted and that he be recognized as a party.

IV. Acknowledgements

Phillipp acknowledges: (1) he will be a party to the case; (2) he will be required to respond to all discovery requests from other parties in the case; (3) if Phillipp files testimony, other parties may cross-examine their representative at the hearing; (4) if he

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) he is bound by the Procedural Rules of the Public Utility Commission of Texas and the State Office of Administrative Hearings.

WHEREFORE, PREMISES CONSIDERED, Phillipp respectfully requests that this Motion to Intervene be granted, that Phillipp be allowed to participate in this proceeding as a party with all rights thereof to the full extent that he desires to do so, and for such further relief to which he 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 PHILLIPP

CERTIFICATE OF SERVICE

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


Patrick L. Reznik