



Control Number: 41606



Item Number: 433

Addendum StartPage: 0

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

RECEIVED  
2013 AUG 19 AM 9:07  
PUBLIC UTILITY COMMISSION  
FILING CLERK

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

**MOTION TO INTERVENE OF**

**JESUS and DIANA RUIZ, JOSE and LUCIA ANAYA, Jr., J. APOLINAR GRIMALDO  
and MARIA JESUS GRIMALDO, ERMELINDA RESENDEZ, CONSUELO  
MAHESHWARI, EDUARDO and BELINDA ANAYA, MINERVA-ST. JOHN, JOSE  
GUADALUPE VILLARREAL and JESUS LIRA**

TO THE HONORABLE ADMINISTRATIVE LAW JUDGE:

NOW COMES JESUS and DIANA RUIZ, JOSE and LUCIA ANAYA, Jr., J. APOLINAR GRIMALDO and MARIA JESUS GRIMALDO, ERMELINDA RESENDEZ, CONSUELO MAHESHWARI, EDUARDO and BELINDA ANAYA, MINERVA ANAYA-ST. JOHN, JOSE GUADALUPE VILLARREAL, and JESUS LIRA (collectively referred to as "Intervenors"), and files this Motion to Intervene in the above-styled and docketed proceeding pursuant to P.U.C. PROC. R. 22.101, 22.103 and 22.104, and in support thereof respectfully shows the following:

1. On July 3, 2013, Electric Transmission Texas, LLC ("ETT") and Sharyland Utilities, L.P. ("Sharyland") filed their Application to Amend a Certificate of Convenience and Necessity for a 345-kV Transmission Line in Hidalgo and Cameron Counties, Texas. ETT and Sharyland filed with their joint application a list of landowners that could be

directly affected by one or more of the proposed segments. The landowner list included Intervenor as the owners of properties in Hidalgo County, Texas.

2. Intervenor has standing to intervene in this proceeding, as that term is defined in P.U.C. Proc. R. 22.103(b)(2), because Intervenor has a justiciable interest that may be adversely affected by the outcome of this proceeding. As stated above, certain properties in Hidalgo County, Texas are owned by Intervenor. Intervenor has received notice from ETT and Sharyland that said 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 proceeding. This Motion to Intervene is filed before August 19, 2013, and therefore is timely under Order No. 1 in this docket.

3. Attorney Eduardo Anaya pursuant to P.U.C. PROC. R. 22.101(a), hereby notice their appearance as counsel on behalf of Intervenor in the above-styled and docketed proceeding. The name, address, telephone number, and email address for Intervenor's legal counsel are as follows:

LAW OFFICE OF EDUARDO ANAYA, P.C.  
7801 S. CAGE STE. 101  
PHARR, TEXAS 78577  
TELEPHONE: (956)702-3111  
TELECOPIER: (956)702-5133  
EANAYALAW@SBCGLOBAL.NET

Intervenor requests that the Public Utility Commission of Texas and all parties to this proceeding serve copies of all notices, correspondence, pleadings, discovery, and other documents upon the authorized representatives at the address shown above.

WHEREFORE, PREMISES CONSIDERED, Intervenor respectfully requests that this Motion to Intervene be granted, that they be allowed to participate in this proceeding as a

party with all rights thereof to the full extent they desire to do so, and for such further relief to which they may be entitled.

Respectfully submitted,

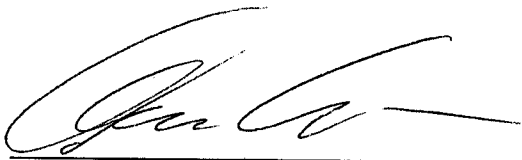
Law Office of Eduardo Anaya, P.C.  
7801 S. Cage Ste. 101  
Pharr, Texas 78577  
Telephone: (956)702-5133  
Telecopier: (956)702-3111  
eanayalaw@sbcglobal.net

By: 

Eduardo Anaya  
St. Bar No. 00795222  
**ATTORNEY FOR INTERVENORS**

### **CERTIFICATE OF SERVICE**

I certify that a copy of this document was served on all parties in this proceeding on August 15<sup>th</sup>, 2013, in the following manner: by e-mail, facsimile or first class U.S. mail.

  
Eduardo Anaya