



Control Number: 41606



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

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PUBLIC UTILITY COMMISSION
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JOINT APPLICATION OF
ELECTRIC TRANSMISSION TEXAS,
LLC AND SHARYLAND UTILITIES,
L.P. TO AMEND THEIR
CERTIFICATE OF CONVENIENCE
AND NECESSITY FOR THE
PROPOSED NORTH EDINBURG TO
LOMA ALTA DOUBLE-CIRCUIT 345
KV TRANSMISSION LINE IN
HIDALGO AND CAMERON
COUNTIES, TEXAS

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BEFORE THE STATE OFFICE

OF

ADMINISTRATIVE HEARINGS

MOTION TO INTERVENE OF TVC DONNA GROVES, LLC.

TO THE HONORABLE ADMINISTRATIVE LAW JUDGE:

NOW COMES, TVC DONNA GROVES, LLC., and files this Motion to Intervene in the above-referenced proceeding, and in support thereof, respectfully shows the following:

I. AUTHORIZED REPRESENTATIVE

Attorney, Mark A. Twenhafel pursuant to P.U.C. Proc. R. 22.101(a) hereby notices his appearance as counsel on behalf of Intervenor, TVC DONNA GROVES, LLC. 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:

Mark A. Twenhafel
Walker & Twenhafel, L.L.P.
P.O. Drawer 3766
McAllen, Texas 78504-0766
(956) 687-6225 ext. 203
(956) 686-1276 (fax)
Email: markt@rgvlawyers.com

TVC DONNA GROVES, LLC. 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

TVC DONNA GROVES, LLC. has a justifiable interest in the proceeding. TVC DONNA GROVES, LLC. owns property and a habitable structure 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. TVC DONNA GROVES, LLC. 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. TVC DONNA GROVES, LLC. therefore, has standing to intervene under P.U.C. PROC. R. 22.013(b)(2). At present, the property is being successfully utilized for on-going agricultural activities. Additionally, an employee engaged in agricultural operations currently leases the habitable structure (residence) owned by TVC DONNA GROVES, LLC. located on the property. TVC DONNA GROVES, LLC. will suffer a loss of property value, and will suffer a direct impact and impairment on its agricultural and business activities due to the property directly impacted. The Motion to Intervene is filed within 30 days of the date ETT/Sharyland filed its Application and therefore is timely under P.U.C. PROC. R 22.104(b). TVC DONNA GROVES, LLC. requests that this Motion to Intervene be granted and that they be recognized as parties.

IV. ACKNOWLEDGMENTS

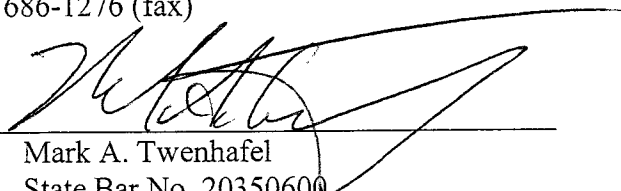
TVC DONNA GROVES, LLC. acknowledges: (1) they will be a party to the case; (2) they will be required to respond to all discovery requests from other parties in the case; (3) if TVC DONNA GROVES, LLC. files testimony, other parties may cross-examine their representatives at the hearing; (4) if they file 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, TVC DONNA GROVES, LLC. respectfully requests that this Motion to Intervene be granted, that TVC DONNA GROVES, LLC. 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,

WALKER & TWENHAFEL, L.L.P.
P.O. Drawer 3766
McAllen, TX 78504-0766
(956) 687-6225 ext. 203
(956) 686-1276 (fax)

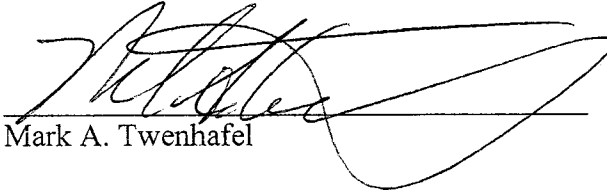
By: _____


Mark A. Twenhafel
State Bar No. 20350600

ATTORNEY FOR TVC DONNA GROVES, LLC.

CERTIFICATE OF SERVICE

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


Mark A. Twenhafel