



Control Number: 41606



Item Number: 681

Addendum StartPage: 0

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

RECEIVED  
2013 AUG 19 PM 2:33  
PUBLIC UTILITY COMMISSION  
FILING CLERK

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

**FORTCO PROPERTIES LTD. MOTION TO INTERVENE**

COMES NOW, Fortco Properties, Ltd. and files this Motion to Intervene in the above-captioned docket pursuant to P.U.C. PROC. R. 22.101, 22.103 and 22.104. This motion is filed prior to the Intervention Deadline established in Order No. 2 as August 19, 2012 and movants take notice of Order Nos. 1 and 2 issued by the State Office of Administrative Hearings.

**I. Authorized Representative**

Attorneys Edward D. "Ed" Burbach and Andres Medrano pursuant to P.U.C. PROC. R. 22.101(a) notice their appearance as counsel on behalf of Fortco Properties Ltd.

Edward D. "Ed" Burbach  
State Bar No. 03355250  
(512) 542-7070  
(512) 542-7270 (Fax)  
[eburback@gardere.com](mailto:eburback@gardere.com)

Andres Medrano  
State Bar No. 24005451  
(512) 542-7013  
(512) 542-7223 (Fax)  
[amedrano@gardere.com](mailto:amedrano@gardere.com)

GARDERE WYNNE SEWELL LLP  
600 Congress Avenue  
Suite 3000  
Austin, Texas 78701-2978

## **II. Standing to Intervene**

Fortco Properties Ltd. has a justiciable interest in this proceeding in accordance with P.U.C. PROC. R. 22.103(b)(2). Fortco Properties Ltd. owns property that may be directly impacted by one or more of the routes proposed by Electric Transmission Texas, LLC (ETT) and Sharyland Utilities (Sharyland) (together, Joint Applicants) and have received notice from the Joint Applicants in accordance with P.U.C. PROC. R. 22.52(a)(3). Fortco Properties Ltd. requests that this Motion to Intervene be granted.

WHEREFORE, PREMISES CONSIDERED, Fortco Properties Ltd. respectfully requests that it be granted intervenor status to participate as a party in this proceeding.

Respectfully submitted,




Edward D. "Ed" Burbach  
State Bar No. 03355250  
(512) 542-7070  
(512) 542-7270 (Fax)  
[eburback@gardere.com](mailto:eburback@gardere.com)

Andres Medrano  
State Bar No. 24005451  
(512) 542-7013  
(512) 542-7223 (Fax)  
[amedrano@gardere.com](mailto:amedrano@gardere.com)

GARDERE WYNNE SEWELL LLP  
600 Congress Avenue  
Suite 3000  
Austin, Texas 78701-2978

**CERTIFICATE OF SERVICE**

I hereby certify that a true and correct copy of the foregoing instrument will be served via facsimile or first-class mail to all parties of record in this proceeding on this 12<sup>th</sup> day of August, 2013.

  
Marissa Nuenaber