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PUBLIC UTILITY COMMISSION
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JOINT APPLICATION OF ELECTRIC
TRANSMISSION TEXAS, LLC AND
SHARYLAND UTILITIES TO AMEND
ITS CERTIFICATE OF CONVENIENCE
AND NECESSITY FOR THE 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

**RUSSELL PLANTATION L.P. AND J&S INVESTMENTS, INC. MOTION TO
INTERVENE**

COMES NOW, Russell Plantation L.P. and J&S Investments, Inc. 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 Mark A. Mayfield and Andres Medrano pursuant to P.U.C. PROC. R. 22.101(a) notice their appearance as counsel on behalf of Russell Plantation L.P. and J&S Investments, Inc.

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II. Standing to Intervene

Russell Plantation L.P. and J&S Investments, Inc. has a justiciable interest in this proceeding in accordance with P.U.C. PROC. R. 22.103(b)(2). Russell Plantation L.P. and J&S Investments, Inc. 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). Russell Plantation L.P. and J&S Investments, Inc. requests that this Motion to Intervene be granted.

WHEREFORE, PREMISES CONSIDERED, Russell Plantation L.P. and J&S Investments, Inc. respectfully requests that it be granted intervenor status to participate as a party in this proceeding.

Respectfully submitted,




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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 19th day of August, 2013.



Marissa Nuenaber