

Control Number: 41606



Item Number: 718

Addendum StartPage: 0

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

§

\$

§ §

§

§

2013 AUG 19 PM 2:35 PUBLIC UTH TY COMPLIESSION FILING CLERK

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 **BEFORE THE STATE OFF**

OF

ADMINISTRATIVE HEARINGS

BARREDA GARDENS PARTNERSHIP L.P. MOTION TO INTERVENE

COMES NOW, Barreda Gardens Partnership L.P. 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 Barreda Gardens Partnership L.P.

Mark A. Mayfield State Bar No. 13284390 (512) 542-7115 (512) 542-7315 (Fax) mmayfield@gardere.com

Andres Medrano State Bar No. 24005451 (512) 542-7013 (512) 542-7223 (Fax) amedrano@gardere.com GARDERE WYNNE SEWELL LLP 600 Congress Avenue Suite 3000 Austin, Texas 78701-2978

II. Standing to Intervene

Barreda Gardens Partnership L.P has a justiciable interest in this proceeding in accordance with P.U.C. PROC. R. 22.103(b)(2). Barreda Gardens Partnership L.P 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). Barreda Gardens Partnership L.P requests that this Motion to Intervene be granted.

WHEREFORE, PREMISES CONSIDERED, Barreda Gardens Partnership L.P respectfully requests that it be granted intervenor status to participate as a party in this proceeding.

Respectfully submitted,

Mark A. Mayfield State Bar No. 13284390 (512) 542-7115 (512) 542-7315 (Fax) mmayfield@gardere.com

Andres Medrano State Bar No. 24005451 (512) 542-7013 (512) 542-7223 (Fax) 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 19th day of August, 2013.

Marissa Nuenaber