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SOAH DOCKET NO. 473-13-5207
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FILED CLEAR

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

MOTION TO AMEND REQUEST TO INTERVENE OF WILLIAM J. FLOWERS

TO THE HONORABLE ADMINISTRATIVE LAW JUDGE:

NOW COMES WILLIAM J. FLOWERS (referred to as "Flowers"), and files this Motion to Amend Request to Intervene of William J. Flowers in the above-styled and docketed proceeding pursuant to P.U.C. PROC. R. 22.101, 22.102, 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 Joint Application to Amend Their Certificates of Convenience and Necessity for the North Edinburg to Loma Alta Double-Circuit 345-kV Transmission Line in Hidalgo and Cameron Counties, Texas.

2. Flowers has standing to intervene in this proceeding, as that term is defined in P.U.C. PROC. R. 22.103(b)(2), because Flowers has a justiciable interest that may be adversely affected by the outcome of this proceeding. Flowers has received notice from ETT and Sharyland that his property in Hidalgo County, Texas 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. On August 21, 2013, Flowers filed a Request to Intervene in the above-referenced document. As of the filing of this Motion, no party has objected to said Request.

3. In addition, Flowers is an authorized representative for Vancouver Resources, Inc. ("Vancouver"). Vancouver has standing to intervene in this proceeding because Vancouver has a justiciable interest that may be adversely affected by the outcome of this proceeding. Vancouver owns property in Hidalgo County, Texas that may be directly affected by the proposed transmission line that is the subject of this proceeding.

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4. Vancouver's officer and director is a non-resident (living in Europe), and Flowers takes care of Vancouver's affected property in Hidalgo County. In addition, Flowers intended to include Vancouver in his original Request to Intervene but its inclusion was erroneously omitted. Flowers now seeks to amend his Request to Intervene to clarify that he is acting individually and as authorized representative for Vancouver in this proceeding.

5. This motion is not brought to cause delay and is unlikely to disrupt the proceeding in any way. Allowing Flowers to amend his Request to Intervene in this proceeding would not be prejudicial to or an additional burden upon the legal rights of any existing party because the deadlines for submission of testimony and discovery have not passed, and Flowers will accept and agree to abide by the procedural schedule and any orders already in place on his own behalf and on behalf of Vancouver. The public interest will be served by participation of directly affected landowners such as Flowers and Vancouver.

6. For these reasons, good cause exists to grant this Motion to Amend.

7. Attorneys, Todd W. Boykin and Mindi L. McLain, pursuant to P.U.C. PROC. R. 22.101(a), also hereby notice their appearance as counsel of record on behalf of Flowers, individually and as representative for Vancouver. All parties to this proceeding should serve copies of all notices, correspondence, pleadings, discovery, and other documents as follows:

BURDETT MORGAN WILLIAMSON & BOYKIN, LLP
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WHEREFORE, PREMISES CONSIDERED, Flowers respectfully requests that this Motion to Amend Request to Intervene of William J. Flowers be granted, that Flowers be allowed to participate in this proceeding as a party, individually and as authorized representative for Vancouver, with all rights thereof to the full extent he desires to do so, and for such further relief to which he may be entitled.

Respectfully submitted,
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By: Mindi L. McLain

Todd W. Boykin

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Mindi L. McLain

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**ATTORNEYS FOR FLOWERS, INDIVIDUALLY AND AS
REPRESENTATIVE FOR VANCOUVER**

CERTIFICATE OF SERVICE

I certify that a copy of this document was served on all parties in this proceeding on September 6, 2013, in the following manner: by e-mail, facsimile or first class U.S. mail.

Mindi L. McLain
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