



Control Number: 42087



Item Number: 220

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APPLICATION OF ONCOR ELECTRIC  
DELIVERY COMPANY, LLC TO AMEND A  
CERTIFICATE OF CONVENIENCE AND  
NECESSITY FOR A PROPOSED 138-Kv  
CREZ TRANSMISSION LINE IN DENTON,  
TARRANT, AND WISE COUNTIES, TEXAS  
(HICKS TO ELIZABETH CREEK)

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**LENNAR HOMES OF TEXAS LAND AND CONSTRUCTION, LTD'S  
MOTION TO INTERVENE**

Lennar Home of Texas Land and Construction, Ltd. ("Lennar") moves to intervene as follows:

**I.**

**IDENTITY OF INTERVENOR**

1. Intervenor is Lennar Home of Texas Land and Construction, Ltd.

**II.**

**LEGAL REPRESENTATIVE**

2. The name, mailing address, telephone number, and email address of Lennar's authorized representative is as follows:

Curt Covington  
ccovington@munsch.com  
Sarah A. Cardwell  
scardwell@munsch.com  
MUNSCH HARDT KOPF & HARR, P.C.  
3800 Lincoln Plaza  
500 N. Akard Street  
Dallas, Texas 75201-6659  
Tel: (214) 855-7500  
Fax: (214) 855-7584

3. Lennar requests that all pleadings, orders, correspondence, and filing be served on its legal representative. Lennar's legal representative agrees to accept service by email.

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**III.**  
**BASIS FOR INTERVENTION**

4. Lennar owns approximately 835 acres in Tarrant and Denton Counties that is zoned to be developed for single-family and industrial uses. The proposed transmission line routes affect this land. See **Exhibit A**, detailing the area of impact on Lennar's land.

5. Approximately 580 acres of Lennar's land is preliminary platted to be developed as a part of its Sendera Ranch community, a community of single-family homes. Lennar has over 2000 single-family homesites remaining to be developed. The next phase of development is currently being permitted through The City of Fort Worth, and is expected to begin construction in April of 2014. It is estimated that the potential transmission-line route could reduce the number of developable lots by approximately 15%. See **Exhibit B**, depicting the immediate impact of the line on Sendera Ranch.

6. The other 255 acres of Lennar's land was recently under contract to be sold to an industrial developer, who intended to develop approximately 2.7 million square feet of industrial facilities. It is estimated that the potential transmission-line route could reduce the estimated developable area of industrial facilities by nearly 1/3.

7. In sum, out of the 53 route options, 24 touch Lennar's property.

8. As such, Lennar has a justiciable interest which may be adversely affected by the outcome of this proceeding and on that basis seeks to intervene.

**IV.**  
**CONCLUSION AND PRAYER**

Accordingly, Lennar respectfully requests that its Motion to Intervene be granted, and that it be allowed to participate as a party to this proceeding, and for such other and further relief to which it may be justly entitled.

Respectfully Submitted,

**MUNSCH HARDT KOPF & HARR, PC.**

By: 

Sarah A. Cardwell

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**ATTORNEYS FOR LENNAR HOME OF TEXAS  
LAND AND CONSTRUCTION, LTD.**

**CERTIFICATE OF SERVICE**

I hereby certify that on this 18th day of February, 2014, a true and correct copy of the foregoing document has been served on all parties of record by U.S. First Class Mail, facsimile, or hand-delivery.

  
Curt Covington





**Legend**

- Alternate Transmission Line Routes
- County Boundary
- Sendera Ranch East, Phase VIII-2 Lots
- 75 Foot Transmission Line Easement

**Transmission Line Impact Exhibit**

Sendera Ranch East, Phase VIII-2 Proposed Lots

City of Fort Worth, Denton County, Texas

**JACOBS**

**EXHIBIT**