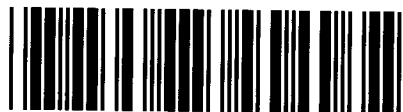




Control Number: 43599



Item Number: 6

Addendum StartPage: 0

RECEIVED  
2014 NOV -3 PM 4:27  
PUBLIC UTILITY  
COMMISSION  
FILING CLERK

APPLICATION OF LCRA § BEFORE THE PUBLIC  
TRANSMISSION SERVICES §  
CORPORATION TO AMEND ITS §  
CERTIFICATE OF CONVENIENCE §  
AND NECESSITY FOR THE § COMMISSION OF TEXAS  
PROPOSED BLUMENTHAL §  
SUBSTATION AND 138 KV §  
TRANSMISSION LINE PROJECT IN §  
BLANCO, GILLESPIE AND §  
KENDALL COUNTIES, TEXAS §

**BRUCE H. C. HILL FOR FREDERICKSBURG ROYALTY, LTD, HAROLD K.  
SOHNER FOR SOHNER FAMILY TRUST AND MICHAEL AND PATRICIA  
GREEN'S MOTION TO INTERVENE**

TO THE HONORABLE ADMINISTRATIVE LAW JUDGE:

NOW COMES, Bruce H. C. Hill for Fredericksburg Royalty, LTD, Harold K. Sohner for Sohner Family Trust and Michael and Patricia Green (the "Luckenbach Alliance"), pursuant to Public Utility Commission ("PUC") Procedural Rules §§ 22.101, 22.102, 22.103 and 22.104, and files this Motion to Intervene in the above referenced proceeding, and in support thereof, respectfully shows the following:

**I. AUTHORIZED REPRESENTATIVE**

Attorneys Patrick L. Reznik and Cassie Gresham pursuant to P.U.C. Proc. R. 22.101(a), hereby notice their appearance as counsel on behalf of Intervenor's of the Luckenbach Alliance in the above-styled and numbered proceeding before the Public Utility Commission of Texas.

The name, address, and telephone number of Intervenor's authorized representative is as follows:

Patrick L. Reznik  
BRAUN & GRESHAM, PLLC  
P.O. Box 1148

6

Dripping Springs, Texas 78620  
512-894-5426 (telephone)  
512-894-3405 (fax)  
Email: [preznik@braungresham.com](mailto:preznik@braungresham.com)

The Luckenbach Alliance requests that the Commission and all parties to this proceeding serve copies of all notices, correspondence, pleadings, briefs, requests for information, and other documents on said authorized representative.

## **II. Jurisdiction**

The Commission has jurisdiction over the parties and subject matter of this proceeding pursuant to PURA § 37.053.

## **III. Basis for Intervention**

The Luckenbach Alliance has a justiciable interest in this proceeding. The Luckenbach Alliance owns property that may be directly impacted by one or more of the routes for LCRA Transmission Services Corporation. ("LCRA TSC") proposed transmission line. Luckenbach Alliance has been notified by LCRA TSC that their property 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 docket. The Luckenbach Alliance, therefore, has standing to intervene in under P.U.C. PROC. R 22.103(b)(2). The Motion to Intervene is filed within 45 days of the date LCRA TSC filed its Application and therefore is timely under P.U.C. PROC. R 22.104(b). The Luckenbach Alliance requests that this Motion to Intervene be granted and that they be recognized as parties.

## **IV. Acknowledgements**

The Luckenbach Alliance acknowledges: (1) they will be a party to the case; (2) they will be required to respond to all discovery requests from other parties in the case; (3) if the Luckenbach Alliance files testimony, other parties may cross-examine


their representative at the hearing; (4) if they file any documents in this case, copies of those documents will be served to every other party in this case, except where modified by alternative service procedures set out by order in this proceeding; and (5) they are bound by the Procedural Rules of the Public Utility Commission of Texas and the State Office of Administrative Hearings.

WHEREFORE, PREMISES CONSIDERED, the Luckenbach Alliance respectfully requests that this Motion to Intervene be granted, that the Luckenbach Alliance be allowed to participate in this proceeding as a party with all rights thereof to the full extent that they desire to do so, and for such further relief to which they may be entitled.

Respectfully submitted,

BRAUN & GRESHAM, PLLC

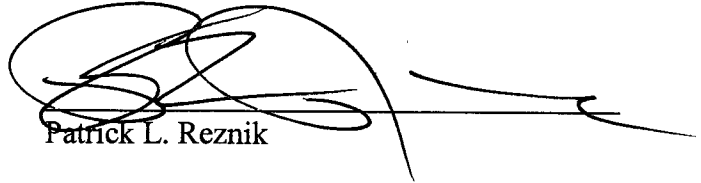
P.O. Box 1148 (Mailing)  
Dripping Springs, Texas 78620  
14101 Hwy. 290 W., Suite 1100 (Physical)  
Austin, Texas 78737  
512-894-5426 (telephone)  
512-894-3405 (fax)

By   
Patrick L. Reznik  
State Bar No. 16806780  
Cassie Gresham  
State Bar No. 24045980

**ATTORNEYS FOR LUCKENBACH  
ALLIANCE**

**CERTIFICATE OF SERVICE**

I certify that a copy of this document will be served on all parties of record on this the 3rd day of November, 2014, in accordance with Public Utility Commission Procedural Rule 22.74.



Patrick L. Reznik