



Control Number: 44649



Item Number: 243

Addendum StartPage: 0

SOAH DOCKET NO. 473-15-3596  
PUC DOCKET NO. 44649

2015 JUN -5 PM 4:11

PUBLIC UTILITY COMMISSION  
FILED

APPLICATION OF CROSS TEXAS § BEFORE THE STATE OFFICE  
TRANSMISSION, LLC TO AMEND A §  
CERTIFICATE OF CONVENIENCE §  
AND NECESSITY FOR THE §  
LIMESTONE TO GIBBONS CREEK § OF  
345-KV TRANSMISSION LINE IN §  
BRAZOS, FREESTONE, GRIMES, §  
LEON, LIMESTONE, MADISON AND §  
ROBERTSON COUNTIES § ADMINISTRATIVE HEARINGS

**J. ROBERT DICKERSON, TRUSTEE'S MOTION TO INTERVENE**

TO THE HONORABLE ADMINISTRATIVE LAW JUDGE:

NOW COMES, J. Robert Dickerson, Trustee (the "Dickerson 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 of the Dickerson 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  
Dripping Springs, Texas 78620  
512-894-5426 (telephone)

243

512-894-3405 (fax)  
Email: [preznik@braungresham.com](mailto:preznik@braungresham.com)

The Dickerson 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 Dickerson Alliance has a justiciable interest in this proceeding. The Dickerson Alliance own property that may be directly impacted by one or more of the routes for Cross Texas Transmission, LLC. (“CTT”) proposed transmission line. Dickerson Alliance has been notified by CTT 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 Dickerson 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 CTT filed its Application and therefore is timely under P.U.C. PROC. R 22.104(b). The Dickerson Alliance requests that this Motion to Intervene be granted and that they be recognized as a party.

## **IV. ACKNOWLEDGEMENTS**

The Dickerson Alliance acknowledge: (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 Dickerson 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 ("PUC") and the State Office of Administrative Hearings ("SOAH").

WHEREFORE, PREMISES CONSIDERED, the Dickerson Alliance respectfully requests that this Motion to Intervene be granted, that the Dickerson 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 THE  
DICKERSON ALLIANCE**

**CERTIFICATE OF SERVICE**

I certify that a copy of this document will be served on all parties of record on this the 5<sup>th</sup> day of June, 2015, in accordance with Public Utility Commission Procedural Rule 22.74.

A handwritten signature in black ink, appearing to read 'Patrick L. Reznik', written over a horizontal line.

Patrick L. Reznik